



The Grauer School Cal-OSHA COVID-19 Prevention Plan

January 28, 2021

Grauer School Safe Campus Response Team/Task Force (Ad Hoc, including regular advisors)

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COVID-19 Prevention Program

Q. How will The Grauer School identify and evaluate its COVID-19 risk mitigation plans and procedures?

- Conduct work specific evaluations using Identification of COVID Hazards Form (see **Form A**).
- Consistently evaluate employees' potential workplace exposures based on who is allowed on campus.
- Regularly review general orders from the State of California, Cal-OSHA, and the San Diego Department of Public Health regarding COVID risks and prevention.
- Evaluate existing COVID-19 prevention protocols in the workplace and add additional prevention protocols as necessary.
- Conduct periodic inspections to identify unhealthy conditions, work practices and/or procedures that could lead to potential spread of COVID-19 on campus.

Form A. Identification of COVID-19 Hazards

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.

Person conducting the evaluation:

Date:

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

Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards	Places and times	Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers	Existing and/or additional COVID-19 prevention controls, including barriers,
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			partitions and ventilation

Q. How are Grauer employees involved in the identification and evaluation of COVID-19 hazards?

- Teachers are informed of risk mitigation procedures through the Grauer Roadmap to Return document, regular posts on the Teacher’s Lounge, during weekly faculty meetings and regular correspondence from the Head of School, Dr. Stuart Grauer.
- Teachers are involved in the evaluation process by offering regular feedback to the administration as to how well procedures are being followed around campus.

- The Leadership Team is discussing and assessing risk mitigation procedures weekly during team meetings.
- Leadership Team members divide up responsibilities for ensuring risk mitigation procedures are being followed, for example ensuring social distancing during lunch, monitoring the cleaning of the school, checking the CO2 levels of each room, etc.

Q. How are Grauer employees screened for COVID-19 symptoms?

Grauer employees self-screen for COVID-19 symptoms daily by checking their temperatures and ensuring they are under 100 degrees fahrenheit, ensuring there are no other symptoms present such as a cough, runny nose, sore throat, difficulty breathing, etc, and ensuring they have not been exposed to an infected individual, attended a gathering or traveled out of state. Then faculty and staff confirm their self-screening through the Grauer Health Checker on our proprietary learning management system, Gradescape. Several thermometers are placed around campus for easy use by employees.

Q. How is the correction of COVID-19 hazards documented?

Unsafe or unhealthy work conditions, practices or procedures will be documented (see **Form B** below), and corrected in a timely manner based on the severity of the hazards, as follows:

- A Leadership Team member will be assigned to remedy a task based on what type of problem is encountered.
- There will be a timely follow up to determine if the remedy has been effective in reducing the spread of COVID-19 on campus by another member of the Leadership Team.

Form B: COVID-19 Inspections

Date:

Name of person conducting the inspection:

Work location evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Bathroom signage			

Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Walkways			
Outdoor classrooms			
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			
Regular COVID testing that is social distanced			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			

Face shields/goggles			
Respiratory protection			
Gowns for COVID testing days			

Q. Is Grauer supplying Personal Protective Equipment (PPE) used to control employees’ exposure to COVID-19?

The Grauer School evaluates the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, and provides 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.

Q. What is the role of face masks? Can we remove them?

Face masks are required for all Grauer people on campus... they don’t replace social distancing—they add to it. They may be challenging for teens to wear all day, so we expect to be giving a lot of reminders, along with reminders to wash hands and keep hands from the face. (Please see our coverage of social distancing, herein.)

Face masks “may be the single most important low-hanging opportunity for slowing Covid-19’s spread and giving people the security they need to bring our societies back to life.”—*Harvard Business Review*.

High quality, thorough face masking will cover someone’s cough or sneeze to prevent or minimize it from being expelled into the air, and it provides a barrier to touching one’s face—they are effective against smaller particles, known as “aerosols.” "Louder speech produces more droplets in these aerosols: one minute of loud speaking is estimated to generate at least 1,000 virion-containing droplet nuclei that remain airborne” for more than eight minutes.¹ A good mask keeps those out of our systems.²

All students and staff arrive at school with masks and wear them all day, unless excused from this by an individual teacher with substantial cause. For instance, socially distanced students surfing or hiking at a safe distance from one another in the school habitat corridor. The following are exceptions to the use of face coverings in our workplace:

¹ <https://www.opensmartedu.org/>

² <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/how-to-wash-cloth-face-coverings.html>

- 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 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.

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.

Q. Can we ever take our masks off during the school day?

Face coverings should be worn at all times except during approved, limited-cohort outdoor recreation, meals, snacks, or when it needs to be replaced. ALL STUDENTS must keep a paper bag with their name marked in their backpack where they store their mask until it needs to be put on again.

Q. What kind of face mask should we wear?

CDC recommends wearing cloth face coverings in public settings where other social distancing measures are difficult to maintain (e.g., grocery stores and pharmacies) especially in areas of significant community-based transmission.

We are looking for a high aerosol filtration to block this virus. There is limited knowledge available on the performance of various commonly available fabrics used in cloth masks—and yet there is broad consensus that facemasks play an outsized role in the prevention of the spread of the coronavirus. “Importantly, there is a need to evaluate filtration efficiencies as a function of aerosol particulate sizes in the 10 nm to 10 μm range, which is particularly relevant for respiratory virus transmission.”³

Without a medical or expert basis, but from what we see so far: (1) Cotton, particularly at high/tight weaves, (2) in combination with two or three plies of hybrid combinations of fabrics, seems to perform better if the mask is (3) a good fit. Gaps (as caused by an improper fit of the mask) can result in over a 60% decrease in the filtration efficiency.⁴ The school can direct parents to references of evaluated materials, rather than requiring a particular composition. There are already materials tests available from reputed research institutions and excellent guidance on facemask care (see footnote).⁵

³ <https://pubs.acs.org/doi/abs/10.1021/acsnano.0c03252>

⁴ An example: <https://www.pattersonvet.com/ProductItem/078939683>

⁵ <https://pubs.acs.org/doi/abs/10.1021/acsnano.0c03252>

Neck gaiters and bandanas are not an acceptable substitute for a face mask.

Q: How often should face masks be washed?

Cloth face masks made of fabric such as cotton, should be washed after every wearing using hot water. Disposable, blue surgical masks should be thrown away when visibility soiled as they cannot be laundered, according to Johns Hopkins. Neck gaiters and bandanas are not acceptable as noted above.

Q: How can a face mask be safely removed?

According to Johns Hopkins, a face mask can be safely removed by following the steps below:⁶

1. Wash your hands or use alcohol-based hand sanitizer containing at least 60% alcohol.
2. Don't touch the front of the mask or your face.
3. Carefully remove your mask by grasping the ear loops or untying the ties. For masks with a pair of ties, unfasten the bottom ones first, then the top ones.
4. If your mask has filters, remove them and throw them away. Fold the mask and put it directly into the laundry or into a disposable or washable bag for laundering.
5. Clean your hands again.

Q. Does the State or County require face masks?

California Dept of Health has published face coverings guidance 6/18/20 and specified situations of exemption for face coverings that we may want to be prepared for.

- Persons age two years or under. These very young children must not wear a face covering because of the risk of suffocation. (The CDC recommends washing after each use.)
- Persons with a medical condition, mental health condition, or disability that prevents wearing a face covering. This includes persons with a medical condition for whom wearing a face covering could obstruct breathing or who are unconscious, incapacitated, or otherwise unable to remove a face covering without assistance.
- Persons who are hearing impaired, or communicating with a person who is hearing impaired, where the ability to see the mouth is essential for communication.
- Persons for whom wearing a face covering would create a risk to the person related to their work, as determined by local, state, or federal regulators or workplace safety guidelines.
- Persons who are obtaining a service involving the nose or face for which temporary removal of the face covering is necessary to perform the service.
- Persons who are seated at a restaurant or other establishment that offers food or beverage service, while they are eating or drinking, provided that they are able to

⁶ <https://www.hopkinsmedicine.org/health/conditions-and-diseases/coronavirus/coronavirus-how-to-care-for-your-face-mask>

maintain a distance of at least six feet away from persons who are not members of the same household or residence.

- Persons who are engaged in outdoor work or recreation such as swimming, walking, hiking, bicycling, or running, when alone or with household members, and when they are able to maintain a distance of at least six feet from others.

Q. How will the School ensure Student Hygiene?

- The School will provide all-school training in our health and hygiene expectations at our normal assembly at the start of the school year.
- We are working with plumbers to install high quality hands-free equipment (sinks, toilets, and soap) across campus in high touch areas. A few outdoor washing stations are ideal, to avoid agglomeration in enclosed spaces like bathrooms, where only hand washing is desired.
- The experts are telling us that hand washing five times a day can have a major impact on our health and the spreading of the coronavirus: teachers will encourage this as students enter classes and the lunch line.
- We'll have hand sanitizer in all classrooms. Teachers are expected to insist students start class with hands washed or sanitized.
- Touch-free hand sanitizer dispenser stations are outside all three of the school's main entries into classrooms.
- Masks prevent face touching.
- PPE must not be shared, e.g., gloves, goggles and face shields.
- Education is a key! We'll be educating for all this.

Q. How will Grauer investigate and respond to COVID-19 cases?

We will follow the decision tree for employees or students who contract COVID-19 that was created by the San Diego County Office of Education (please see above in section II).

In the event an outbreak is detected within our School community, we will:

- Consult immediately with our local hospital (Scripps Encinitas, (760) 633-6501) and county public health officer, (County of San Diego Health and Human Services Agency, Public Health Services, 619-531-5800).
- Notify and log all relevant students, their families, and our employees (while maintaining appropriate expectations of privacy).
- Meet with the individual infected by phone or Zoom and collaboratively develop a list of all individuals that the person had been in close contact with over the past 5-7 days. Then contact each of these individuals by phone to recommend testing and then notify our entire faculty and staff that there was a potential positive case on campus.
- Enact localized shelter-in-place restrictions, if advised.

- Support contact-tracing efforts as undertaken by the county's public health office or other officials.
- Support the student who may be quarantined, through hybrid learning. Provide a substitute teacher for faculty who is temporarily at home and can work for a few days.
- If there is a case on campus we will attempt to implement school wide testing, given the small size of our school.
- Until such time, we will go on remote/distance "e-Home learning" for 14 days or, if warranted, more.
- We will attempt to find cohort groups and contact them, recommending testing. As noted above, we will attempt to identify individuals who have been in close contact (within six feet for 15 minutes or more). Teachers understand this responsibility and students will be tested on it.
- Areas of the school visited by the COVID-19 positive individual may also need to be closed temporarily for cleaning and disinfection.

Q. How will The Grauer School Communicate with employees to ensure they have up to date COVID-19 information regarding temporary school closures, updates to risk mitigation practices, and potential hazards?

The Grauer School aims to create effective two-way communication with all faculty and staff, about the following information:

- Who faculty and staff should report COVID-19 symptoms and hazards to: Principal Dana Aplanalp-Diggs, COVID-19 liaison, or Head of School, Dr. Stuart Grauer via email or telephone call.
- Faculty and staff can report symptoms and hazards freely without fear of judgment, consequence or breach of confidentiality in the case of symptoms.
- Faculty and staff have access to regular testing on campus. We tested the entire faculty in September, November after Thanksgiving break, and on January 4 after winter break. We will continue to test 30-50 community members every two weeks through UCSD's EXCITE lab. Testing is coordinated through our Principal Dana Aplanalp-Diggs, COVID-19 liaison.
- Faculty and staff have access to testing resources off campus via our Teacher's Lounge on Gradescape, which is updated regularly by Principal Dana Aplanalp-Diggs, COVID-19 liaison. For example, information is posted about county public testing sites, like Del Mar Fairgrounds.
- In the event the Grauer School needs 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.

- 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 is shared through our Roadmap to Reopening document, via our Teacher’s Lounge, via regular e-blasts and the Grauer newsletter. The Grauer School is in constant communication with all stakeholders about potential COVID-19 hazards.
- All COVID-19 related materials, including the Roadmap to Reopening is posted on our school website.

Q. What if a school employee has a medical condition that puts the employee at a greater risk of severe COVID-19 illness?

We do not discriminate between any kinds of illnesses. Employees with medical conditions that preclude them from being on campus of course must stay home. If an employee has a job which can be fulfilled by remote work, we have allowed remote work. When allowable by all relevant agencies, our operations depend upon in-person instruction—this is our fundamental business model. We are a secondary school and our students depend completely upon teacher supervision on campus. If an employee job is dependent upon direct, interpersonal interaction such as live classroom engagement, of course this cannot be accommodated from an employee home since our students are in our classrooms and completely dependent upon a teacher.

Q. How are faculty and staff receiving effective training and instruction on COVID-19 related matters?

- During Faculty Workshop days and Monday whole staff meetings faculty and staff have been trained on COVID-19 hazards and prevention protocols.
- Critical updates from the CDC and other local public health and education agencies are posted on the Teacher’s Lounge and included in e-blasts sent to the entire school community as needed.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws are communicated in conjunction with our co-employer, Trinet. Since this is a nation-wide corporation with HR expertise, we know that we have all employee rights, legalities, and benefits covered.
- Basic information about how COVID-19 can spread as well as prevention methods have been shared through faculty meetings and a panel hosted by two parent doctors who discussed the science behind COVID-19 with the faculty. The following information has been provided:
 - 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.
- All faculty and staff were required to pass an assessment that tested their knowledge on the spread and prevention of COVID-19 prior to the school reopening in September of 2020. The assessment was made up of multiple choice and short answer questions.

Q. How will Grauer limit the spread of COVID-19 on campus should there be a positive case?

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
- Grauer uses Trinet as our co-employer and they are our routine source of guidance. Since this is a nation-wide corporation with HR expertise, we know that we have all employee rights, legalities, and benefits covered.
- Grauer provides employees at the time of exclusion with information on available benefits.

Q. How will Grauer report, document and provide access to all necessary information to stakeholders regarding COVID-19 prevention measures?

It is Grauer 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.
- 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.

Q. How will Grauer determine when an infected employee is cleared to return to campus?

COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:

- At least 14 days have passed since COVID-19 symptoms first appeared.
- 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.
- COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 14 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.