

# COVID-19 Prevention Program (CPP) for Pasadena Conservatory of Music (PCM)

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

**Date: April 27, 2021**

## Authority and Responsibility

Stephen McCurry, Executive Director and Cindy Lewis, Operations Manager have 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:

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

## Employee participation

Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by contacting a member of the administrative staff to express their concerns, ask questions, and/or make suggestions.

## Employee screening

We screen our employees by having them self-screen according to CDPH guidelines. Before entering and when exiting the premises, all employees fill out a check-in/check-out form (available [online](#), as a QR code posted at our entrances and exits, and as a physical sheet in the main lobby) to confirm self-screening and document arrival and departure times.

## Correction of COVID-19 Hazards

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

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

Individuals will be identified as being responsible for timely correction.

Follow-up measures will be 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:

- Remote work arrangements where possible.
- 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.

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.

Disposable face coverings are provided by PCM and are available in each administrative office. These face coverings are for use by any employee should they forget to bring their own face covering to work. They may only be worn for one day and then must be thrown away.

Disposable face coverings are also given to any non-employee who arrives without a face covering. Anyone who refuses to wear a face covering will be asked to exit the building. Employees will notify staff of any occurrences of non-compliance with this directive.

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 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.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

## Engineering controls

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

- We have installed plexiglass partitions in the main office.

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

- PCM has increased filtration efficiency to the highest level compatible with the existing ventilation system.
- The ventilation system will be properly maintained and adjusted by Air Conditioning Solutions (ACS).
- In circumstances where the amount of outside air needs to be minimized due to other hazards, such as heat and wildfire smoke, the system will be adjusted to run at 20%. In this situation, the use of portable High Efficiency Particulate Air (HEPA) air purifiers will supplement the filtration system.

- PCM has installed portable High Efficiency Particulate Air (HEPA) air purifiers in rooms without a window or exterior door.

### **Cleaning and disinfecting**

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

- Cleaning and disinfecting supplies are inventoried regularly to ensure adequate supplies are onsite.
- Cleaning and disinfecting supplies are easily accessible to all employees either directly in their office or studio, or at one of several designated stations around campus.
- All employees have been instructed to clean and disinfect frequently touched surfaces in and around their offices and studios. Additionally, teaching faculty have been instructed to allow for extra time between lessons to conduct this cleaning and disinfecting protocol.

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

- Cordon off the affected areas and post signage as needed.
- Engage the services of All-Pro Enterprises, Inc. or other qualified company to perform disinfecting and sanitizing in areas designated as potential risk, as they have the trained personnel with all of the proper PPE.

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

PPE must not be shared.

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. Before leaving a shared-space location, equipment (e.g. photocopier, printer, computer keyboard, etc.) and/or appliances (e.g. coffee maker, microwave, refrigerator handle, etc.) that have been used will be wiped down by the employee. Disinfecting wipes are available in all shared-space locations specifically for this purpose.

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users.

### **Hand sanitizing**

In order to implement effective hand sanitizing procedures, we have placed hand sanitizer containing at least 60% alcohol in the main lobby and the Auditorium.

- Soap and water are available to all employees and visitors in all restrooms.
- All restrooms contain National Patient Safety Agency (NHS) signage for “Hand-washing technique with soap and water” to illustrate the proper way to wash hands using soap and water.
- Employees have been instructed to frequently wash their hands with soap and water for at least 20 seconds or use hand sanitizer containing at least 60% alcohol if soap and water are not immediately available.

### **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.

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

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

Employees who had potential COVID-19 exposure in our workplace will be:

- Offered COVID-19 testing at no cost during their working hours. Employees may obtain a test at a local pharmacy such as CVS, Rite Aid, Walgreens, from their physician or health care provider, or at a city or county testing center. Most locations offer free testing. If a free test cannot be obtained, PCM will reimburse employees for any testing costs not reimbursable by their insurance company.
- Provided with the information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below.

## **System for Communicating**

Our goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and that it includes the following information:

- Employees with Covid-19 symptoms, a positive test for COVID-19, and/or direct exposure with a confirmed case of COVID-19 are required to stay home and should report their situation to Cindy Lewis, Operations Manager and seek guidance from their healthcare provider.
- Employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Where testing is not required, how employees can access COVID-19 testing: Employees may obtain a test at a local pharmacy such as CVS, Rite Aid, Walgreens, from their physician or health care provider, or at a city or county testing center. Most locations offer free testing. If a free test cannot be obtained, PCM will reimburse employees for any testing costs not reimbursable by their insurance company.
- 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.
- 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.
- We will communicate with employees via email, zoom, and phone/in person meetings.

## **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.

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

## 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 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.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we have demonstrated that the COVID-19 exposure is work related. This will be accomplished by providing government-sponsored paid sick leave that may be available, and employer-sponsored paid sick leave in all other cases.
- Providing employees at the time of exclusion with information on available benefits.

## Reporting, Recordkeeping, and Access

It is our policy to:

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

## Return-to-Work 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.
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**Stephen McCurry**

**Cindy Lewis**

## Appendix 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: April 29, 2021**

**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, partitions and ventilation
Entering PCM Campus	Main lobby: M-F 8:00 AM – 10:00 PM	Employees and members of the public may come in contact with one another while waiting to sign in.	Masks required. No contact check-in available to eliminate the need to sign in using pen and paper. Exterior door open during office hours. Social distancing markers, at 6' intervals, provide a visual cue for maintaining distancing if a line forms.
Administrative Services	Ground floor of Building A; M-F 8:00 AM – 6:00 PM	Staff may come in contact with students, parents and visitors	Access is restricted to staff and service providers unless an appointment has been made. Masks required. Decreased density. Maximum capacity signage on all office doors. Social distancing of 6 feet. Portable High Efficiency Particulate Air (HEPA) air purifiers in rooms without windows and/or exterior doors. Plexiglass barrier installed in main office.
Individual Instruction	Studios in Buildings A, B, C & D, daily	Faculty member and student together in studio	Masks required. Decreased density. Maximum capacity signage on all studio doors. Social distancing of 6 feet. High efficiency air filters and/or Portable

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, partitions and ventilation
			High Efficiency Particulate Air (HEPA) air purifiers in rooms without windows and/or exterior doors.
Group Instruction	Large studios in Buildings A, B, C & D, Auditorium and Barrett Hall, weekly	Faculty member(s) and students together in large studio, Auditorium or Barret Hall	Masks required. Decreased density. Maximum capacity signage on all doors. Social distancing of 6 feet. Portable High Efficiency Particulate Air (HEPA) air purifier in rooms without windows and/or exterior doors.
Classroom Instruction	Classrooms, weekly	Faculty member and students together in classroom	Masks required. Decreased density. Maximum capacity signage on classroom doors. Social distancing of 6 feet. Portable High Efficiency Particulate Air (HEPA) air purifiers in classrooms without windows and/or exterior doors.
Library	Ground floor of Building A; M-F 8:00 AM – 6:00 PM	Staff and/or Faculty may come in contact with one another.	Masks are required. Decreased density. Restricted to staff and faculty use only.
Facility Maintenance	PCM campus, M-F 8:00 AM – 5:00 PM	Staff may come in contact with people who are on campus to carry out maintenance, repairs, etc.	Masks are required. Decreased density. Maximum capacity signage on doors. Social distancing of 6 feet. Portable High Efficiency Particulate Air (HEPA) air purifiers in classrooms without windows and/or exterior doors.
Restrooms	All restrooms, M-F 8:00 AM – 10:00 PM, on weekends and after hours as needed.	Staff, faculty, students, and the public may come in contact with someone as they exit the restroom.	All restrooms have signage to indicate single occupancy.

## Appendix B: COVID-19 Inspections

Date:

Name of person conducting the inspection:

Work location evaluated:

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			
Portable High Efficiency Particulate Air (HEPA) air purifiers			
<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</b> (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			

## Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 testing or related medical services provided by us will be provided in a manner that ensures the confidentiality of employees, with the exception of unredacted information on COVID-19 cases that will be provided immediately upon request to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law.

All employees' medical records will also be kept confidential and not disclosed or reported without the employee's express written consent to any person within or outside the workplace, with the following exceptions: (1) Unredacted medical records provided to the local health department, CDPH, Cal/OSHA, NIOSH, or as otherwise required by law immediately upon request; and (2) Records that do not contain individually identifiable medical information or from which individually identifiable medical information has been removed.

**Date:**

**Name of person conducting the investigation:**

COVID-19 Case Investigation Information

<b>Employee (or non-employee*) name:</b>		<b>Occupation (if non-employee, why they were in the workplace):</b>	
<b>Location where employee worked (or non-employee was present in the workplace):</b>		<b>Date investigation was initiated:</b>	
<b>Was COVID-19 test offered?</b>		<b>Name(s) of staff involved in the investigation:</b>	
<b>Date and time the COVID-19 case was last present in the workplace:</b>		<b>Date of the positive or negative test and/or diagnosis:</b>	
<b>Date the case first had one or more COVID-19 symptoms:</b>		<b>Information received regarding COVID-19 test results and onset of symptoms (attach documentation):</b>	

**Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):**

<b>Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:</b>			
<b>All employees who may have had COVID-19 exposure and their authorized representatives.</b>	<b>Date:</b>		
	<b>Names of employees that were notified:</b>		
<b>Independent contractors and other employers present at the workplace during the high-risk exposure period.</b>	<b>Date:</b>		
	<b>Names of individuals that were notified:</b>		
<b>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</b>		<b>What could be done to reduce exposure to COVID-19?</b>	
<b>Was local health department notified?</b>		<b>Date:</b>	

\*Should an employer be made aware of a non-employee infection source COVID-19 status.

## Appendix D: COVID-19 Training Roster

Date:

Person that conducted the training:

Employee Name	Signature

## **Additional Consideration #1**

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

#### **Three or more COVID-19 cases in the workplace within a 14-day period.**

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.

#### **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**

#### **20 or more COVID-19 cases within a 30-day period.**

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**.