

GNOMON

COVID-19 PREVENTION, PROTECTION & RESPONSE PLAN

Version 4

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All items on all pages in this plan are subject to change.

COVID-19 Prevention Program (CPP) for Gnomon

This CPP is designed to control exposures to the COVID-19 virus and variants that may occur on the Gnomon campus.

Authority and Responsibility

Gnomon's Executive Director of Operations and designated COVID-19 Compliance Officer, Chris Strompolos, in partnership with Gnomon's Covid-19 Task Force, 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.

Any clarifying or material questions that employees may have about the provisions in the CPP, can be addressed to Chris Strompolos, Executive Director of Operations.

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:

- Compliant face coverings / masks will be mandatory for all on-campus activity for approved exempted or unvaccinated individuals. Mask wearing and handwashing reminders are posted throughout campus. For any campus events which involve eating and drinking, there will be designated and space-assessed areas outside or under tents (rain, sun, etc.) where masks may be temporarily removed whilst eating and drinking. Afterward, mask usage will resume.
- Ongoing review of 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 periodically reassess.
- Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by our open-door policy of reporting issues and concerns to Chris Strompolos, Executive Director of Operations or to a member of Gnomon's Covid-19 Task Force.
- PPE supplies and sanitizing stations are available to all employees. These stations are visible, strategically placed and accessible in all areas of the Gnomon campus.
- Conduct workplace-specific, on-campus evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Conduct on-campus, periodic inspections using the **Appendix B: COVID-19 Inspections form** as needed to identify any unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.

Employee & Student Screening

A health screening questionnaire is available and may be instituted as part of initial vaccination tracking.

Gnomon has mandated that all individuals entering campus are to be fully vaccinated before re-entry and submit proof thereof. Accommodations, guidance and legal protections have been extended to all those with religious, philosophical or medical reasons.

Identification measures: All staff, faculty and full-time program students are issued durable, coded, picture ID badges which correspond to Gnomon's internal SIS and internal tracking IDs to verify status.

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:

- Faculty, staff and the COVID-19 Task Force will work together to regularly assess possible hazards.
- Mask and hygiene protocols are followed throughout the school day.
- Each restroom includes signage and supplies for disinfecting after use.
- Handwashing signs are posted throughout campus. Lecture rooms, labs and offices are professionally cleaned, disinfected, and sanitized multiple times daily.
- If a student, faculty, or staff member tests positive for COVID-19, their classroom or office is cleared and sanitized.
- Proper protocol is followed to report cases appropriately. In-house contact tracing is followed, and communication is issued regarding any positive COVID-19 exposure, including updates, as needed.
- The severity of the hazard will be assessed, and correction time frames assigned, accordingly. Individuals are identified as being responsible for timely correction.
- Follow-up measures are taken to ensure timely correction.

Control of COVID-19 Hazards

Capacity and Spacing Mindfulness

Whenever possible, Gnomon remains mindful and engaged regarding:

- Accommodations of remote work arrangements and staggered work schedules.
- Reducing the number of persons in an area at one time if possible. Capacity mindfulness.
- Adjusting work processes and schedules to enhance the safety and health of all entering campus.
- Technical capacity to provide for distance education has been established where possible.

Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors and outdoors, including students, vendors and suppliers, and where required by orders from the California Department of Public Health (CDPH) or local health department. KN95 masks and blue, 3-layered surgical masks are available to all employees, students, and visitors, as needed. Masks and PPE supplies will be provided to all employees, students, faculty and authorized visitors and guests as needed. Employees are responsible for washing their own cloth masks and sanitizing self-purchased face shields. Masks/face coverings are currently mandatory for anyone on school property, for both indoor and outdoor activities for any individuals that have an approved exemption or are currently unvaccinated.

Engineering / Facilities Controls

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

- Circumstances where the amount of outside air needs to be minimized due to other hazards, such as heat and wildfire smoke. HEPA, Aerus ActivePure filter systems; and/or clean a/c-heat system filters for classrooms and offices.
- Ventilation systems are professionally cleaned annually and checked on a regular schedule. Filters have been upgraded to MERV 13 and are changed out as needed. HVAC systems are regularly serviced.
- We strive to increase filtration efficiency to the highest level compatible with our existing ventilation system(s) within our operational constraints.

Cleaning, sanitizing and disinfecting cycles:

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

- Faculty with students in classrooms are provided cleaning and sanitizing products, compatible with CDPH Guidelines for approved products in school settings, to use throughout the school day according to their own needs and rhythms in the classroom. Within the class, lab and work schedule times are set aside specifically for surface cleaning and disinfection. Cleaning/sanitizing products (such as wipes, disinfecting sprays, disposable non-latex gloves and disposable paper towels and hand sanitizer) are also available to all employees, as needed, and strategically placed in common-use areas on campus, including the community kitchen and all restrooms, plus 'how to' signage for effective cleaning/sanitizing 'high touch' areas.
- Adequate supplies are maintained for the school by routine stock checking and ordering coordinated by Gnomon Operations.
- Signs and community communications reinforce the request for cleaning/sanitizing after each use/before leaving a room, i.e., all high touch areas including copy machines, printers, doorknobs, soap dispensers, toilet flush handles, microwave doors, refrigerator doors, fax machines, pencils, paper cutters, shredders, etc.

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

In the case of a positive COVID-19 case, the area in question would be evacuated and closed off as soon as possible. Employees would determine the safest way to handle any immediate clean-up need. A request to our cleaning crew for a sanitizing service) would be placed immediately. All appropriate supervisors, departments and executives would be contacted and briefed on the situation, commencing with the designated COVID-19 Compliance Officer.

Shared Tools, Equipment, and Personal Protective Equipment (PPE)

PPE must not be shared, e.g., gloves, goggles, and face shields. Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible.

Where there must be sharing, the items will be disinfected between uses by the people using them. Sanitizing products are provided in all shared areas, classrooms, and offices on campus.

Hand Sanitizing

To implement effective hand sanitizing procedures, we:

- Posted hand washing reminder signs and proper hand washing technique signs throughout campus and in all handwashing-specific areas.
- Distributed effective and safe hand sanitizer to all offices and classrooms. Individual hand sanitizing 'towelettes' are available in front office, and for anyone who might need/want for class or office.
- Encourage and allow time for employee handwashing.
- Provide employees with an effective hand sanitizer and prohibit hand sanitizers that contain methanol (i.e., methyl alcohol) or 70%+ isopropyl alcohol.
- Encourage the entire Gnomon community to maintain proper hand hygiene at all times.

Personal protective equipment (PPE) used to control employees' exposure to COVID-19

We have evaluated the need for PPE (such as gloves and face shields) as required by CCR Title 8, section 3380, and provide such PPE as needed.

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained.

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

Investigating and Responding to COVID-19 Cases

This will be accomplished by using the **Appendix C: Investigating COVID-19 Cases** form. Employees who had potential COVID-19 exposure on-campus will be:

- Contacted to notify them of their potential or presumed exposure and directed to quarantine and seek testing per CADPH guidelines.
- Offered information on how to schedule COVID-19 testing, at no cost during their working hours. Hourly employees will be reimbursed for travel time and hours used if they must seek testing outside of work hours.
- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to them.

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 should report COVID-19 symptoms and possible hazards to their immediate supervisor and Covid-Compliance Officer, Chris Stropoulos, either by direct conversation, phone call or email, and how
- Employees can report symptoms and hazards without fear of reprisal.
- Accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness is accomplished through direct interview and agreement with either the Pedagogical or Business Administrators (depending on the area in which the employee works.)
- Where testing is not required, employees can access COVID-19 testing through their health insurance provider or at free testing sites within LA County. All employees have been provided links with information about testing and those resources are updated as needed.
- 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 on how employees and students can access rapid testing has been provided with detailed information and resources posted and communicated.

Employee Participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

- Providing everyone access to COVID-19 prevention protocols and instructional videos, courses, training and professional development.
- Reading weekly updates and / or distributing Federal, State/County and Local COVID-19 health regulations, mandates, IHEs to staff, faculty, students by Gnomon's C-19 Task Force.

Advanced Precautions & Proof Of Vaccination

- Staff, Faculty and Students are all pre-packaged and vetted through a proof of vaccination pipeline. ID's and vaccination cards are all submitted for on-campus attendance and work. If an individual does not meet vaccination or accommodation requirements and reports any symptoms or exposure, they are denied entry to campus. If a case is reported, the COVID-19 Compliance Officer, the COVID-19 Task Force, Human Resources and Student Affairs teams are contacted appropriately. Tracing documentation is initiated, spaces are shut down and evacuated accordingly. Religious/philosophical and medical accommodations are accepted.

Training and Instruction

Effective training and instruction via written communication and professional development sessions are made available to all 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 has been communicated via a COVID-19 addendum to the employee handbook issued to all employees.
- 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.
- The importance of 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 certificates of training completion and professional development will be securely kept on record with Gnomon Human Resources.

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 in accordance with the current guidance from LADPH and Cal/OSHA 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 following the practices set forth in our employee handbook and COVID-19 handbook addendum.
- Providing employees at the time of exclusion, or when otherwise requested, 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

As follows:

- Vaccinations are required for all on-campus staff, faculty and students.
- Mandatory weekly testing for all valid and officially approved exempted individuals.
- Sanitizing and PPE supply stations are available campus-wide, strategically placed, visible and accessible to all.
- Signage Posted: Hand washing signs. Mask guidelines. Los Angeles County Department of Public Health compliance certificate. COVID-19 Task Force contact information.
- Proximity planning and spacing precautions and guidelines instituted.
- Mask enforcement appropriate to current health mandates.
- COVID-19 cases with COVID-19 symptoms will not return to work until the individual has met the required return-to-work criteria specified by LADPH and Cal/OSHA.
- COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until the criteria specified by LADPH and Cal/OSHA has been met.
- 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.

Multiple COVID-19 Infections and COVID-19 Outbreaks

If an outbreak or multiple cases within a 14-day period are identified at the school, 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

- Gnomon will provide resources for COVID-19 testing as required by LADPH and Cal/OSHA. COVID-19 testing will be provided at no cost to employees during employees' working hours. Weekly testing is required for all individuals who have requested an accommodation. Resources and information will be provided.
- Gnomon will provide resources toward COVID-19 testing for anyone exposed on campus or in the workplace. COVID-19 testing will be provided at no cost to employees during employees' working hours upon request.

- 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

If there are more than 20 identified cases within a short time or CDPH or LA County DPH orders it, 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 14-day period(s) and who remain at the workplace. COVID-19 testing will be provided at no cost to employees during employees' working hours. Weekly testing is required for all individuals who have requested an accommodation.

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 Corrections

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 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**. Reporting will be conducted by Chris Strompolos, Executive Director of Operations in partnership with the Gnomon COVID-19 Task Force.

Additional Elements, Information and Resources:

[COVID-19 Prevention – Emergency Temporary Standards
www.dir.ca.gov/dosh/coronavirus/](https://www.dir.ca.gov/dosh/coronavirus/)

APPENDICES

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 encounter one another, regardless of whether employees are performing an assigned work task or not. For example: classrooms, labs, meetings, entrances, bathrooms, hallways, walkways, elevators, break or eating 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.

The following information will be assessed and acquired:

- Person conducting the evaluation:
- Date of evaluation.
- Name(s) of employee and authorized employee representative that participated
- Interaction, area, activity, workflow, process or equipment that potentially exposes employees to COVID-19
- Hazards
- Places and times of the workday.
- 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 and partitions.
- HVAC Systems, Filtration, Ventilation

APPENDIX B: COVID-19 INSPECTIONS

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Facilities			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Administrative			
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			
PPE			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			

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.

The following information will be assessed and acquired:

- Employee (or non- employee*) name.
- Location where employee worked (or non-employee was present in the workplace).
- Was a COVID-19 test offered?
- Occupation (if non- employee, why they were in the workplace).
- Date investigation was initiated.
- Name(s) of staff involved in the investigation.
- Date and time the COVID-19 case was last present in the workplace.
- Date of the positive or negative test and/or diagnosis.
- Date the case first had one or more COVID-19 symptoms.
- 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).
- Information received regarding COVID-19 test results and onset of symptoms (documentation to be attached).
- 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:
 - All employees who may have had COVID-19 exposure and their authorized representatives.
 - Names of individuals that were notified and date of notification.
 - Independent contractors and other employers present at the workplace during the high-risk exposure period.

Additional information to be provided as to:

- What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?
- What could be done to reduce exposure to COVID-19?
- Was local health department notified? When?

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