



COVID-19 Prevention Program (CPP) for Palo Alto University

Division Responsible: Business Affairs

Office Responsible: VP for Business Affairs

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

Authority and Responsibility

The VP for Business Affairs/ CFO 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.

PAU On-campus Access Procedures

This policy assumes that Santa Clara County meets the State requirements for opening based on the Order of the Health Officer of the County of Santa Clara Phasing Dated June 21, 2021 Given Widespread Community Vaccination”.

Staff and Faculty are allowed to work on campus by following the “Campus Visit Checklist” below. Students and external guests are allowed on campus by appointment only, by following the “Campus Visit Checklist” below.

Campus Status:

- **Allen Calvin Campus** – Open to approved staff, faculty, student workers and students by appointment only. The library is open for curbside pickup by appointment only.
- **Los Altos Campus** - Open to approved staff, faculty, student workers and students by appointment only. Patients are being seen via Teletherapy only.
- **Stanford Campus** – Refer Stanford University’s COVID-19 page for the current status: <https://humsci.stanford.edu/covid-19> . Students and Faculty are advised to reach out to the PsyD Office psydooffice@paloaltou.edu for specific PAU class information.

Campus Visit Checklist:

- **STAFF & FACULTY:**
 - **Obtain Prior Approval Before Arriving On Campus:**

Obtain email approval from division head and division EA and forward to facilities@paloaltou.edu. A minimum of 72-hour notice to facilities is required prior to their first arrival to campus.

PAU Facilities staff will reply via email to the faculty/staff member, confirming that their access is approved based upon available capacity on a first come first serve basis. {No external guests are allowed, unless absolutely essential, as determined by and approved by the division head, with 72-hour notice to PAU Facilities to confirm capacity.}
 - **Complete a ONE-TIME online training via Everfi/Foundry[^].** Faculty and staff members will receive online training on these campus access procedures and social distancing guidelines, COVID-19 information from the CDC, and screening themselves for COVID-19 symptoms, including temperature and/or symptom checks using CDC guidelines. Students will receive online training if they are approved to be on campus. This one-time, 25-30 minute training is mandatory before arriving on campus.
- [^] Questions regarding this survey should be directed to: hr@paloaltou.edu.
- **Required Daily Campus Health Survey:**

Prior to arriving on campus each day (and after completing the approval process above),

each person must complete and successfully pass the Campus Health Survey (which will be emailed to them by PAU Facilities at 5PM the day prior). Once completed, an email will be sent to the individual with an “Approved” or “Not Approved” for campus message with the date for which they approved to be on campus.

- **For those not fully vaccinated: wear a mask or face covering** (covering both nose and mouth) while indoors on campus, or outdoors if within 6 feet of others. An N95 face covering will be provided to unvaccinated persons upon request to facilities@paloaltou.edu.
- **STUDENTS & VISITORS:**
 - **Obtain Prior Approval Before Arriving On Campus:**

Students- Obtain email approval from the Office of Academic Affairs oa@paloaltou.edu with a minimum of 72-hr notice.

Visitors- Coordinate with your designated PAU staff or faculty member for access, or contact facilities@paloaltou.edu with a minimum of 72-hr notice.
 - **Required Daily Campus Health Survey:**

Prior to arriving on campus each day (and after completing the approval process above), each person must complete and successfully pass the Campus Health Survey (which will be emailed to them by PAU Facilities at 5PM the day prior). Once completed, an email will be sent to the individual with an “Approved” or “Not Approved” for campus message with the date for which they approved to be on campus.
 - **For those not fully vaccinated: wear a mask or face covering** (covering both nose and mouth) while indoors on campus, or outdoors if within 6 feet of others.

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- 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 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 and their authorized employees’ representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: contacting the Human Resources Department via email at hr@paloaltou.edu.

Employee screening

We screen our employees by: Staff, Faculty, and Student Workers are required to (a) obtain permission from their Division’s Vice President and notify the Facilities Department with 72 hours notice prior to arriving in person to work, and (b) to self-screen according to CDPH guidelines and complete an online Campus Health Survey attestation prior to arriving to work in person.

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be evaluated by the Facilities Department on a regular basis and corrected in a timely manner based on the severity of the hazards.

Control of COVID-19 Hazards

Physical Distancing

While the physical distancing recommendation is in effect by the California Department of Public Health (CDPH) or local health department, where possible, we ensure at least six feet of physical distancing at all times in our workplace by:

- Non-essential staff will be instructed to continue working remotely with only essential staff on each campus.
- Shared offices will maintain a 6 foot distance between occupants at all times.
- Conference rooms will remain closed.
- Classrooms will be set up with a 6 ft. radius between students.
- Professors must stay within their 6 foot radius; i.e. only use half of the white board
- Staggered exit of the classroom to be orchestrated by the Professor (i.e. dismissal by each row).
- Classroom and office doors, or any space with 2 or more occupants must remain open.
- Library to remain closed; curbside delivery and dropoff by appointment for library material check out and return. Library is available as a study/WiFi access area for up to 8 students who have made reservations 72 hours in advance with the Academic Affairs division, and approved by PAU Facilities. (Refer to Section 2, "Classroom Capacity & Student Occupancy")
- Bathrooms will be modified for one person occupancy.
- PAU Cafe and Los Altos kitchen will maintain a 6 foot distance between occupants at all times. Dining area and shared appliances (refrigerators, microwaves) will be closed. Vending machines will remain open - hand sanitizer station to be placed nearby.
- Shared water dispensers will remain closed.
- No buffet style catering. Individual meals, or individually wrapped meals are allowed.
- On-site events will only be allowed, when approved by Division Head and PAU Facilities, and where social distancing protocol can be practiced.
- Social distancing signage will be placed on the ground for high traffic areas or where queues form.
- One-way walkways and hallways will be established.
- Maximum occupancy to allow for social distancing at all times will be enforced by limiting the number of people allowed into the facility.

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 unvaccinated 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. A cloth or disposable face covering will be supplied upon request by visiting the Facilities Department office on campus or by sending an email to facilities@palou.edu. An N95 face covering will be provided to unvaccinated persons upon request.

The following are exceptions to the use of face coverings in our workplace:

- Fully vaccinated employees upon current guidance by the California Department of Public Health (CDPH) or local health department.
- When an unvaccinated employee is alone in a room.

- While an unvaccinated employee is 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 unvaccinated 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.

Engineering controls

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

- Particulate Air Cleaners (PACs) are installed in key areas inside each building based upon the guidance of the California Department of Public Health, CAL-OSHA, and the Chronicle of Higher Education.
- We ask that employees refrain from adjusting or turning the PACs off as they need to run while the space(s) are occupied in order to be effective and to ensure that the filters are able to capture any COVID-19 particles that may be introduced to the space(s).
- The Department of Facilities has worked with Marina Mechanical to ensure our HVAC system for the classrooms at the Calvin Campus is in compliance with the guidelines published by CAL-OSHA in February of 2021.

Cleaning and disinfecting

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

- During Business Hours: Once per week, PAU Facilities staff will operate electrostatic misters, utilizing CDC (N-list) approved chemicals, to sanitize classrooms, single occupant offices, and high touch surfaces throughout the campus.
- After Hours: PAU's janitorial vendor will use CDC (N-list) chemicals to perform nightly cleaning and disinfection. Special attention will be paid to spaces that are actively occupied during the day (individual offices, classrooms, common areas, walkways).
- Disinfectant cleaning materials (such as wipes) will be made available in classrooms and common areas.

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

- Buildings and/or specific rooms and areas where a COVID-19 positive person spent time will be assessed on a case-by-case basis. The cleaning scope will be implemented based on the risk of potential contamination as determined by PAU Facilities, and janitorial service, in coordination with the impacted department(s).
- PAU Facilities staff will execute the following actions (as applicable):
- Identify areas that require restricted access during and immediately following enhanced cleaning.
- Communicate in writing, the scope of cleaning to PAU Facilities and/or other vendors responsible for cleaning.
- Communicate with impacted department(s).
- When cleaning and disinfecting rooms with increased surface area (due to a large number of desks, tables, and other furniture), and where a spray application of disinfectant is needed, PAU Facilities will notify the building coordinator in advance, if the spraying will occur during normal business hours. Advance notice allows the building occupants to be apprised of any areas that may require restricted access during cleaning.

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, disinfectant cleaning materials (such as wipes) will be made available in classrooms and common areas.

Hand sanitizing

In order to implement effective hand sanitizing procedures:

- Hand sanitizer stations will be distributed throughout the campus.
- Encourage employees to wash their hands for at least 20 seconds each time.

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.

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.

Investigating and Responding to COVID-19 Cases

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

- Deferred to County and State resources for COVID-19 testing, and allowed to obtain testing during working hours with no dock in pay.
- Provided with information on benefits described in the Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to them.
- Contact tracing will be conducted by County and State resources. PAU's Human Resources department will notify the Santa Clara County COVID Support Team and provide them with the information necessary for the Santa Clara County Health Department to conduct its contact tracing procedure.

COVID-19 Testing

- You may find a COVID-19 testing location near you by visiting the website of your local health department. For Santa Clara County, visit: www.sccfreetest.org.
- The County of Santa Clara urges the public to get tested for COVID-19 when experiencing symptoms of COVID-19 and whenever recommended by the California Department of Public Health's [Updated Testing Guidance](#).

What should I do while I'm waiting for test results?

- If you were in close contact (within 6 feet for a total of 15 minutes or more over a 24-hour period) of a person with COVID-19 and have no symptoms, then follow the Home Quarantine Steps while you are waiting for your test results.
- If you were not in close contact with someone with COVID-19 and do not have COVID-19 symptoms, you just need to wait for your test results. You do not need to follow isolation or quarantine steps while you wait for your results.
- If you develop any COVID-19 symptoms, and they are new symptoms that you do not usually have in daily life, then you may have COVID-19 and you must follow the Home Isolation Steps,

even if you are fully vaccinated.

- CDC recommends that anyone with any signs or symptoms of COVID-19 get tested, regardless of vaccination status or prior infection. If you get tested because you have symptoms or were potentially exposed to the virus, you should stay away from others pending test results and follow the advice of your health care provider or a public health professional.

Who should get tested for a current COVID-19 infection CDC Guidelines:

- People who have symptoms of COVID-19.
- Most people who have had close contact (within 6 feet for a total of 15 minutes or more over a 24-hour period) with someone with confirmed COVID-19.
 - Fully vaccinated people with no COVID-19 symptoms do not need to be tested following an exposure to someone with COVID-19.
 - People who have tested positive for COVID-19 within the past 3 months and recovered do not need to get tested following an exposure as long as they do not develop new symptoms.
- Unvaccinated people who have taken part in activities that put them at higher risk for COVID-19 because they cannot physically distance as needed to avoid exposure, such as travel, attending large social or mass gatherings, or being in crowded or poorly-ventilated indoor settings.
- People who have been asked or referred to get tested by their healthcare provider, or state, tribal, local external icon, or territorial health department.

Vaccination Information

- You may find a COVID-19 Vaccine location near you via one of the following methods: (a) search [vaccines.gov](https://www.vaccines.gov), (b) text your ZIP code to 438829, (c) or call 1-800-232-0233. Or contact your local health department, for Santa Clara County visit: www.sccfreevax.org.
- According to the Centers for Disease Control, studies show that COVID-19 vaccines are effective at keeping you from getting COVID-19. Getting the vaccine will also help keep you from becoming seriously ill even if you do get COVID-19. The vaccine teaches our immune systems how to recognize and fight the virus that causes COVID-19. Vaccines cannot give you COVID-19. You may have side effects after vaccination. These are normal, and should go away in a few days.
- People are considered fully vaccinated 2 weeks after their second dose of the Pfizer-BioNTech or Moderna COVID-19 Vaccine, or 2 weeks after the single-dose Johnson & Johnson's Janssen COVID-19 Vaccine.
- Employers are required to ascertain the vaccination status of their employees, with an option to decline to state. We ask employees to respond promptly to the HR Department should they receive a request.
- Vaccinated individuals may obtain a digital copy of their vaccination record by visiting The State of California website: <https://myvaccinerecord.cdph.ca.gov/>
- According to the Centers for Disease Control, studies show that COVID-19 vaccines are effective at keeping you from getting COVID-19. Getting the vaccine will also help keep you from becoming seriously ill even if you do get COVID-19. Vaccines cannot give you COVID-19. You may have side effects after vaccination. These are normal, and should go away in a few days.
- People are considered fully vaccinated 2 weeks after their second dose of the Pfizer-BioNTech or Moderna COVID-19 Vaccine, or 2 weeks after the single-dose Johnson & Johnson's Janssen COVID-19 Vaccine.

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 the Human Resources Department via email to hr@paloaltou.edu as soon as possible. The name of the individual will be kept confidential.
- That 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.
- Employees can access COVID-19 testing by visiting the State of California website: <https://covid19.ca.gov/get-tested/> or by visiting the local county Department of Health website which for most of the PAU community, this serves to be Santa Clara County: <https://covid19.sccgov.org/covid-19-testing>.
- 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.

Training and Instruction

We will provide effective training and instruction to employees that includes:

- Our COVID-19 policies and procedures, using the Everfi online training system, 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.

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've demonstrated that the COVID-19 exposure is work related. This will be accomplished by offering 80 hours of paid sick time.
- 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.
- The Human Resources Department will 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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DocuSigned by:

Dr. June Klein

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Dr. June Rumiko Klein, VP for Business Affairs and CFO

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Date