

COVID-19 Prevention Program (CPP)



Considerations for COVID-19 Risk Reduction at Five Keys Schools & Programs

Updated 4.7.2023

From Our President and Chief Executive Officer

April 2023

To Our Five Keys Community,

As we serve our students, clients, guests and partner agencies with increasingly in-person services, we want to renew our commitment to safety with a revised set of COVID-19 prevention policies aligned to the Cal/OSHA guidelines that have been established from research. We are striving to be as clear and consistent as possible across all of our sites in preparation for safe school operation, as well as continue to keep staff safety at the forefront of our essential frontline services provided in the Home Free, ReEntry, Homeless Services and Transitional Employment arms of the agency.

Authority and Responsibility

As CEO and President, I want to name the COVID-19 Response Coordinators (safety@fivekeys.org and safety-homelesservices@fivekeys.org) as the central resources responsible for implementing the provisions of this COVID-19 Prevention Plan (CPP) portion of the Injury and Illness Prevention Program (IIPP) in our workplaces. 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 for one another and the people we serve.



Our agency needs your participation identifying and reporting COVID-19 hazards to ourselves and one another. Save the phone number of your safety coordinator so you can text them easily should you learn you've been positively exposed, and be consistent in asking your clients, guests and students to stay home if they are feeling sick. We care deeply about one another. It is important to us that you know employees are protected from any retaliation when helping the agency identify safety hazards. We're in this together.

Take Care of One Another,

Steve Good, CEO and President

A handwritten signature in blue ink, appearing to read "S. Good".

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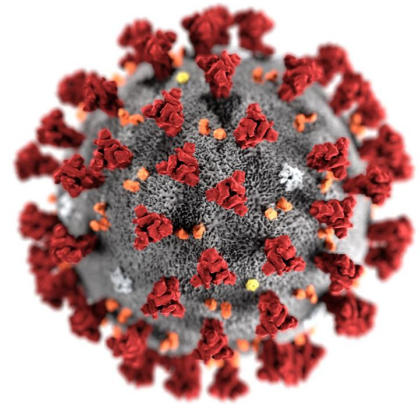
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About COVID-19

Five Keys is committed to keeping its policies aligned to current COVID-19 research. Email safety@fivekeys.com to report out-of-date information. The newest version of our IIPP, including this CPP, will always be posted on our website, www.fivekeys.org.

Symptoms of COVID-19

Infection with SARS-CoV-2, the virus that causes COVID-19, can cause illness ranging from mild to severe and, in some cases, can be fatal. Symptoms typically include fever, cough, and shortness of breath. Some people infected with the virus have reported experiencing other non-respiratory symptoms. Other people, referred to as asymptomatic cases, have experienced no symptoms at all.



According to the CDC, symptoms of COVID-19 may appear in as few as 2 days or as long as 10 days after exposure.

How COVID-19 Spreads

COVID-19 spreads when an infected person breathes out droplets and very small particles that contain the virus. These droplets and particles can be breathed in by other people or land on their eyes, noses, or mouth. In some circumstances, they may contaminate surfaces they touch. People who are closer than 6 feet from the infected person are most likely to get infected.

COVID-19 is spread in three main ways:

1. Breathing in air when close to an infected person who is exhaling small droplets and particles that contain the virus.
2. Having these small droplets and particles that contain virus land on the eyes, nose, or mouth, especially through splashes and sprays like a cough or sneeze.
3. Touching eyes, nose, or mouth with hands that have the virus on them.

Anyone infected with COVID-19 can spread it, even if they are fully vaccinated or do NOT have symptoms (also known as being asymptomatic).

Guiding Documents for COVID-19 Risk Reduction

Although the United States has implemented public health measures to limit the spread of the virus, it is likely that some person-to-person transmission will continue to occur. The CDC website provides the latest information about COVID-19 transmission: <https://www.cdc.gov/coronavirus/2019-ncov/transmission/index.html> .

Five Keys continues to inform its practices based around ongoing scientific discoveries. As of April 2023, the policies and systems adopted are based on the following sources.

Guiding Documents for Five Keys COVID-19 Risk Reduction Plan
LA Dept. Public Health COVID-19 Exposure Management Plan for TK-12 Schools
CA SMARTER Plan
CA Department of Education Stronger Together - Coronavirus (COVID-19)
Center for Disease Control Operational Guidance for K-12 Schools
Cal/OSHA COVID-19 Prevention – Non-Emergency Regulation
CA Dept. of Public Health COVID-19 Public Health Guidance for K–12 Schools to Support Safe In-Person Learning, 2022–2023 School Year

Five Keys Schools and Programs will continue to adjust its safety protocols as additional information arises, including adding requirements for screening or vaccination that may serve to protect the health of students, clients, staff and the general public.

If you test positive for COVID-19

TAKE STEPS TO HELP PREVENT THE SPREAD OF COVID-19



STAY HOME.

Do not leave your home, except to get medical care. Do not visit public areas.



STAY IN TOUCH WITH YOUR DOCTOR.



GET REST AND STAY HYDRATED.

Take over-the-counter medicines, such as acetaminophen, to help you feel better.



SEPARATE YOURSELF FROM OTHER PEOPLE.

As much as possible, stay in a specific room and away from other people and pets in your home.

Operations Across 9 California Counties

School, Housing, Transitional Employment, Reentry Services

Five Keys currently operates across 11 counties, partnering with 17 different jails and 80 community partners. We understand that a one-size-fits-all formula will not work as we operate, so we encourage you to email safety@fivekeys.org if you have any questions about the most up-to-date protocols in your program area.

Prevention & Evaluation of COVID-19 Hazards

We implement the following in our workplace:

1. Documentation of Employee COVID-19 Vaccination Status, which is maintained as a confidential medical record.
 2. Agencywide 'stay home when sick' protocol.
 3. COVID-19 Response Coordinator on duty Monday-Friday to respond effectively and immediately to individuals at the workplace who are a COVID-19 case to prevent or reduce the risk of transmission in the workplace and 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
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See something? Say something.

- Remind peers, clients, students or guests who experience cold or flu-like symptoms to stay home and connect with the Safety Coordinator
- Report recurring concerns to safety@fivekeys.org and cc your supervisor
- Five Keys Safety Team will acknowledge and start all concerns received within one business day.

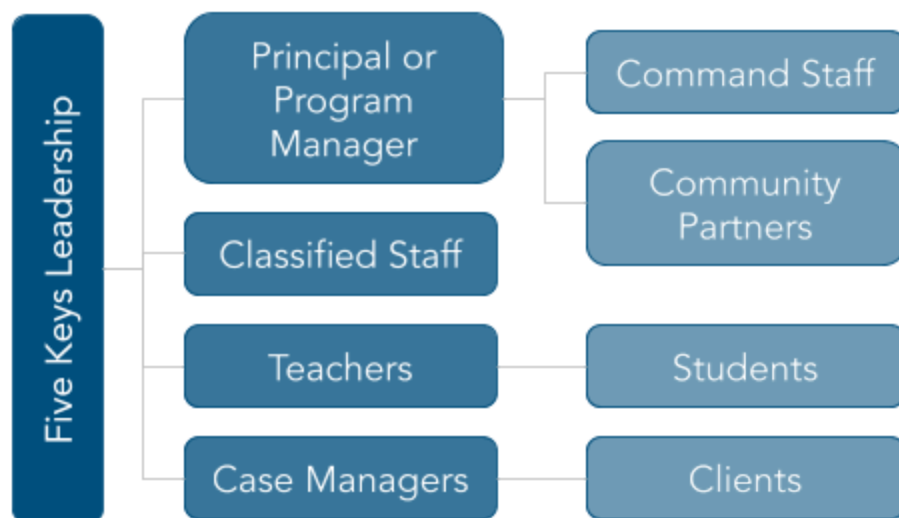
Communication Chain of Command

Five Keys will distribute communication updates consistently so that Employees, Command Staff, Community Partners, Students and Clients have updated information about each of our different site(s). Most updates will arrive by email.

- If your Five Keys point of contact is out of the office for any reason, we'll ask them to indicate in their out-of-office email reply who to contact in their absence.
- **Command Staff & Community Partners:** Please continue letting your Five Keys contact know who we can contact in the event you are unavailable.

Our Five Keys COVID-19 Response Coordinator is reachable by text/phone 5 days a week and will be able to respond to any time-sensitive concerns should your usual Five Keys point person be unavailable. Please note that we only respond to the safety@fivekeys.org email during normal business hours, so contact by phone is best on weekends and during the evening.

Five Keys COVID-19 Safety Hotline: (415) 622-6237







TIP: We suggest you add safety@fivekeys.org to your email address book and (415) 622-6237 to your phone so that important group messages do not get lost in your bulk, promotional or spam folders. COVID-19 Prevention Methods Explained

Five Keys bases its quarantine and isolation practices on guidance from the [Center for Disease Control](#) and California Division of Occupational Safety and Health (Cal/OSHA) regulations and guidance. We will use the term **quarantine** to refer to individuals staying home due to

COVID-19 exposure (even when symptom-free), and we'll use the term [isolation](#) to refer to anyone who is home with a confirmed positive COVID-19 test result.

Eligibility to report to Five Keys in-person varies by scenario. Please contact the Safety Coordinator to get guidance based on your particular situation.

	General Activity	Quarantine	Isolation
	<u>CATEGORY 1:</u> NO known exposure NO current symptoms	<u>CATEGORY 2:</u> YES known exposure with symptoms yet to be identified as COVID	<u>CATEGORY 3:</u> YES to symptoms diagnosed as COVID-19
	<ul style="list-style-type: none"> As a best practice, more distance from those outside your household is generally safer 	<ul style="list-style-type: none"> Stay home until you've been fever-free for 24 hours without needing medicine 	<ul style="list-style-type: none"> Calculated using the onset of symptoms <u>or</u> positive test results, whichever date is <u>earlier</u>
	<ul style="list-style-type: none"> Strive for bigger spaces for group meetings using air purification when possible. 	<ul style="list-style-type: none"> No direct contact with those outside home. Wear a mask when around housemates. Try to stay in room apart from housemates. Use <u>non-contact delivery</u> for grocery or delivery services as needed. 	
	<u>Permitted Activities</u> <ul style="list-style-type: none"> No restrictions Masking optional 	<u>Permitted Activities</u> <ul style="list-style-type: none"> Eligible to report to work based on Safety Report evaluation Masking requirements vary based on scenario 	

Staff, students and visitors are considered eligible to report on site if they are symptom-free. Individuals who have cold or flu-like symptoms should connect with the COVID Safety Coordinator to evaluate their eligibility to report to Five Keys, including noting if masking may be required.

Accommodations for High-Risk Individuals

Five Keys provides reasonable accommodations to employees with medical conditions, disabilities, religious beliefs to allow them to perform their essential job functions. In the COVID-19 context, this may include employees who have medical or other conditions that place them at increased risk of severe illness, prohibit them from getting vaccinated, and/or interfere with their ability to wear a mask.

Per our Accommodations and Interactive Process Policy, Five Keys is committed to accommodating employees with medical conditions that place them at an increased risk of severe COVID-19 illness. Five Keys also makes reasonable accommodations for sincere religious beliefs, observances, and practices. While each accommodation is individual in nature, the Human Resources department will work with employees to evaluate and, where feasible, implement reasonable accommodations that allow employees to perform their essential job functions without posing an undue hardship to the agency's operation or a direct threat to workplace safety and within the medical boundaries designed by an individual's healthcare provider.

HOW TO REQUEST ACCOMMODATION:

<p>STEP 1: Email HR@fivekeys and your Paycom supervisor. We suggest you include 'High Risk Accommodation Request' in the subject line of your email.</p>
<p>STEP 2: Plan to have a brief call or virtual meeting with an assigned HR individual and your manager so that they can figure out what options exist for your role.</p>
<p>STEP 3 (if requested): Help collect any requested documentation from the HR department, including a doctor's note indicating work restrictions.</p>

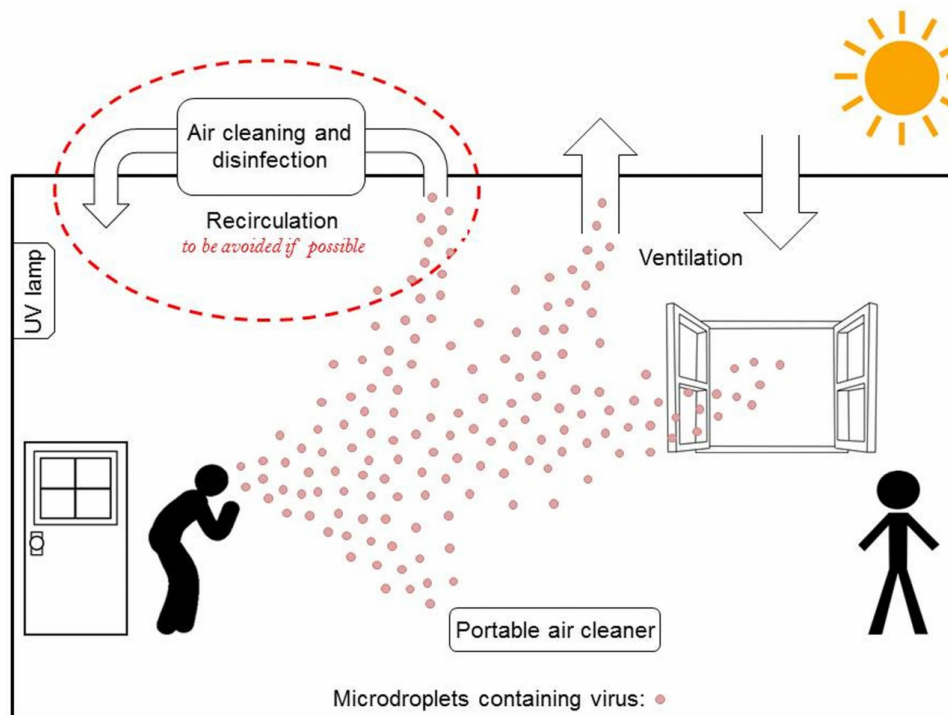
For additional information regarding Five Keys' policy of accommodations and the interactive process, please contact hr@fivekeys.org.

Indoor Ventilation Considerations

Five Keys strives to maximize the quantity of outdoor air circulating in program spaces and is committed to supplementing filtration efficiency in spaces where outdoor air circulation is not accessible.

Cal/OSHA Requirements

For buildings with mechanical or natural ventilation, or both, employers shall maximize the quantity of outside air provided to the extent feasible, except when the United States Environmental Protection Agency (EPA) Air Quality Index is greater than 100 for any pollutant or if opening windows or letting in outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.



Ways to Increase Airflow

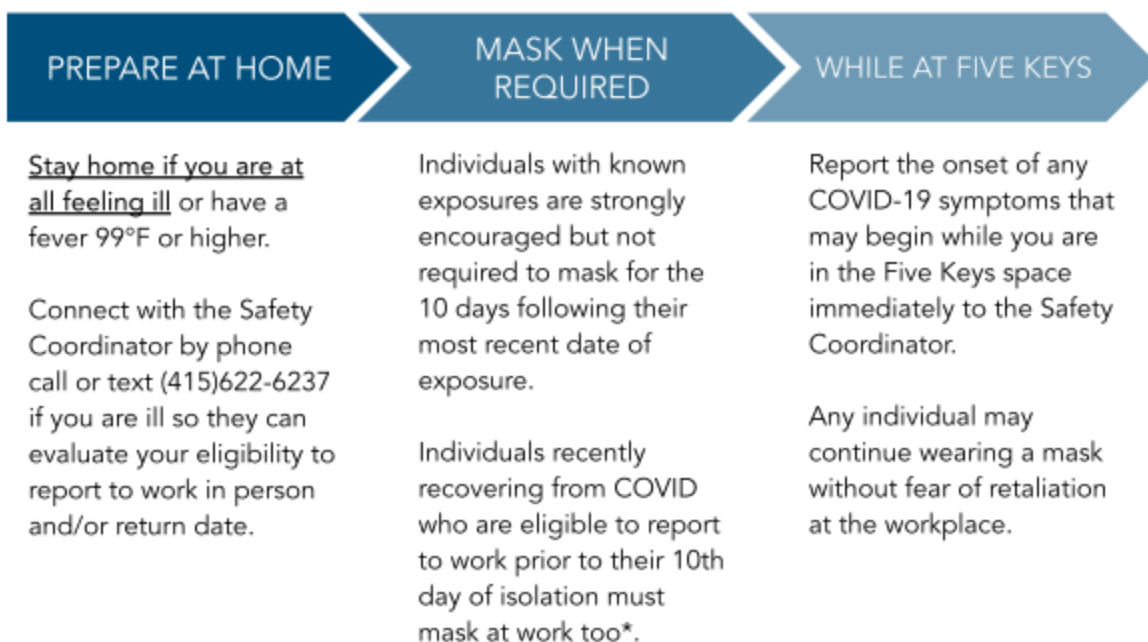
- Open the windows
 - Even better if there is a door or second window that can be opened to allow a breeze to travel through the space
- Open the windows and place a box fan in one to pull indoor air to the outside
- Use a portable air purifier (for sites like in-custody locations w/out windows)
 - Make sure to get the right number of purifiers for the size of space you plan to purify.
- You may use air conditioners, but be aware they do not purify air or circulate fresh air.

Requirements to Enter a Five Keys Site

Staying home when sick is one way of CARING for our community.

A combination of:

- [Pre-Screening steps](#) at home

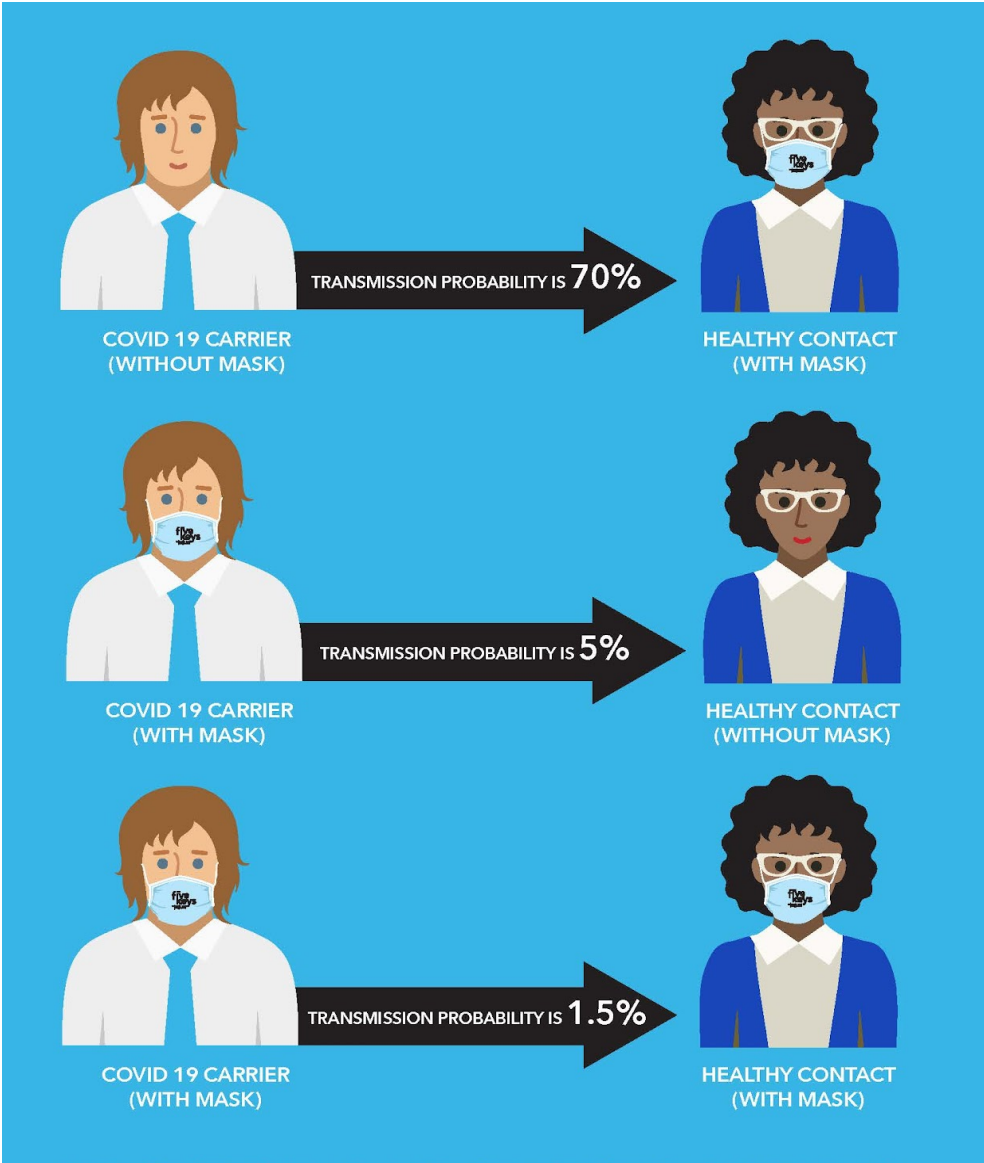


**In-Custody and Community Partners may have additional requirements unique to their site, Cal/OSHA may also provide options for individuals with confirmed negative tests to return to work without a masking requirement if certain criteria are met.*

- Refusal to participate in COVID-19 screening, mask-wearing or any other safety practice may result in the loss of access to Five Keys spaces.
- Five Keys employees who exhibit COVID-19 symptoms (including a temperature reading 99F or above) will be required to submit negative COVID-19 test results prior to returning to on-site duties. Please let safety@fivekeys.org know if you require any accommodations to meet these requirements.

Five Keys Mask Requirements During COVID-19

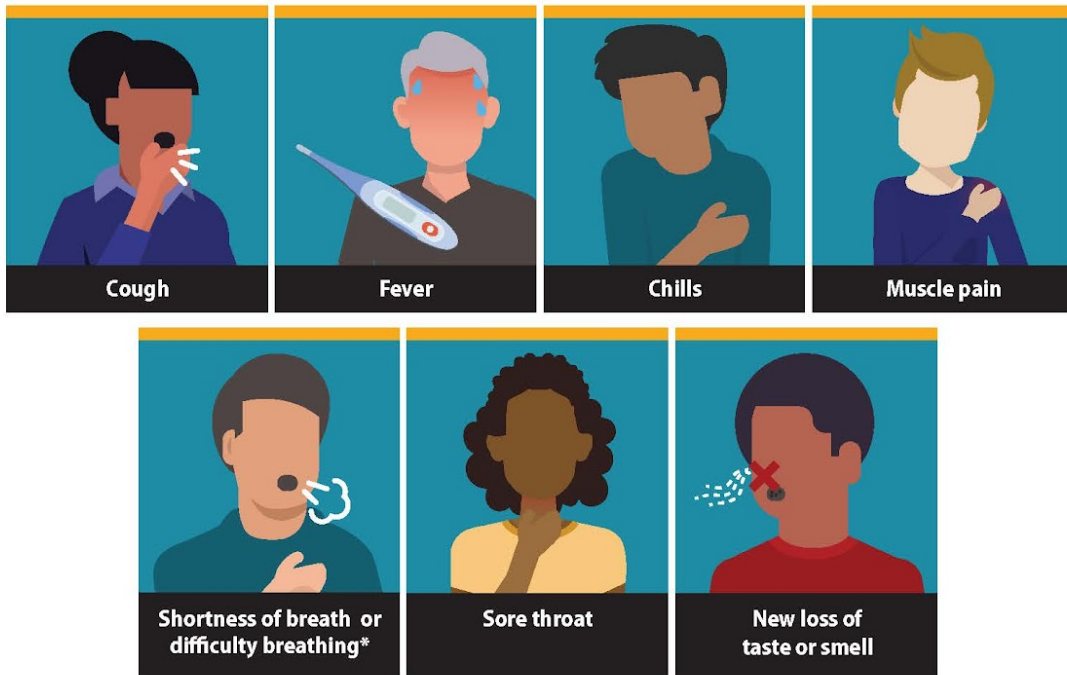
We provide clean, undamaged face coverings to employees (regardless of vaccination status) and train staff in proper mask usage to ensure they are properly worn by employees. Five Keys students, guests and clients may choose to wear masks and are free from retaliation if they choose to do so.



COVID-19 Symptoms to Screen for Daily

Symptoms of Coronavirus (COVID-19)

Know the symptoms of COVID-19, which can include the following:



Symptoms can range from mild to severe illness, and appear 2-14 days after you are exposed to the virus that causes COVID-19.

***Seek medical care immediately if someone has emergency warning signs of COVID-19.**

- Trouble breathing
- Persistent pain or pressure in the chest
- New confusion
- Inability to wake or stay awake
- Bluish lips or face

This list is not all possible symptoms. Please call your medical provider for any other symptoms that are severe or concerning to you.



[cdc.gov/coronavirus](https://www.cdc.gov/coronavirus)

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Questions about Symptoms?

What happens if I am sick or get sick at Five Keys?

Five Keys requires students and staff to stay home if experiencing any illness, especially cough, shortness of breath and/or fever at or above 99°F.

Should You Show COVID-19 Symptoms While at Five Keys, We Will Ask You To:

1. Continue wearing your face covering both your nose and mouth.
2. Relocate to an area isolated from any other staff or students until you are able to consult a medical professional.
 - a. **Five Keys Staff:** We will ask that you return home to quarantine.
 - b. **Students in the Community:** We will ask you to return home.
 - c. **Students in Custody:** We will report your illness to custody staff and defer to internal policy regarding relocation.
3. For serious injury or illness we will call 9-1-1.
4. Isolate from others until you are able to consult a medical professional to advise whether or not you should be tested for COVID-19.
 - a. Quarantine for 10 days, produce a negative COVID-19 test or forward equivalent medical documentation from a licensed medical practitioner explaining that symptoms are diagnosed as something other than COVID-19
 - b. As a reminder, any staff who is off work for more than 3 days for any reason requires medical clearance to return to work.

Should You Test Positive for COVID-19:

1. Please email safety@fivekeys.org. Your status will remain confidential. We will ask about any on-site visits you may have had to Five Keys in the 48 hours leading up to the onset of your symptoms onward.
2. As required by local Public Health officials, Five Keys will follow regional policy regarding exposure reporting and contact tracing. [ADA and FERPA policies are a few of the regulations we follow that protect your privacy during this process.](#)
3. Remain home until you have met [CDC criteria to discontinue home isolation](#) or local health department regulations (*whichever is more restrictive*) including ALL of the following
 - a. 24-hours of temperature readings below 99°F without the aid of any fever-reducing medication
 - b. Doctor's note required if you took 3+ days of sick time during your isolation.
 - c. Staff should use sick time to cover any scheduled hours they are unable to work.
4. Consult with your supervisor to see if working from home during quarantine is appropriate for your situation.

Common Contact Tracing Questions

Five Keys is responsible for figuring out if any other staff, student, partner, client or guest has been exposed to COVID-19 on site and if so, letting affected people know about their status within one business day.

Question from Safety Coordinator	Why We Ask
Have you been contacted by anyone letting you know that you were identified as a 'positive contact' of a known COVID-19 case?	<i>If we know you were exposed on a certain day, that lets us know if you qualify for Worker's Compensation and tells us how far back in your work schedule we should plan to contact trace.</i>
Are you experiencing any COVID-19 symptoms? If so, when did they begin?	<i>Should you test positive, the preferred at home isolation timeline would be based on the first day symptoms started (if you have any).</i>
If you have not felt any COVID-19 symptoms, when did you go to get tested for COVID-19?	<i>Should you test positive but not feel any symptoms, we use the day you took your COVID-19 test as the start of your isolation timeline.</i>
Is anyone else at your home experiencing COVID-19 symptoms? If so, are they able to isolate away from you and mask in common areas?	<i>If there is another case of COVID-19 at your home we will likely ask for a second opinion from your healthcare provider as to when they feel it is safe for you to return to work in person.</i>
If you are required to stay at home to quarantine or isolate, do you want/need to take sick time while you are at home?	<i>Five Keys allows staff to use sick time to recover from COVID-19 and/or to care for a household member who is in recovery. Staff who are able to work at home are not required to use sick time if they do not wish to do so.</i>
Have you been on site at any Five Keys locations during the contact tracing time period (exact dates calculated by Safety Coordinator)?	<i>Five Keys will arrange deep cleaning at any of our sites as needed. It's possible to be contagious up to 48 hours prior to the onset of feeling symptomatic, so we'll ask about those days too.</i>
If you reported to a Five Keys site during your contact tracing time period, which people were you within 6' of for a total of 15+ minutes (regardless of mask usage)?	<i>These are the criteria that define what it means to be a 'positive contact' of a COVID-19 case. Anyone identified on this list will receive a discreet exposure notification if you test positive for COVID-19. We will not name you specifically in our notification.</i>

These questions, along with COVID-19 test results are what our Safety Coordinator uses to determine if you are required to quarantine or isolate at home, and if so, for how long.

STAFF: Know Your Rights

Cal/OSHA Provides some universal employee rights regarding exposure to COVID-19 that happens at the workplace. Five Keys processes supporting these rights are noted below:

<input type="checkbox"/>	No-cost COVID-19 testing if exposed at work	<ul style="list-style-type: none">Request assistance locating COVID-19 testing location from safety@fivekeys.org.
<input type="checkbox"/>	Permission to COVID-19 test During Workday if exposed at work	<ul style="list-style-type: none">Based on known positive contact related to workplace exposure.
<input type="checkbox"/>	Workers Compensation Information provided if exposed at work	<ul style="list-style-type: none">HR Representative Fausto Perez will send relevant paperwork by email.
<input type="checkbox"/>	Expectation to continue with regular schedule if symptom-free and negative.	<ul style="list-style-type: none">Staff are expected to continue reporting to work if a known exposure occurs assuming they remain symptom-free and test negative for COVID.
<input type="checkbox"/>	Universal safety precautions at your site	<ul style="list-style-type: none">Masks available for voluntary use at all Five Keys sitesCleaning supplies available at all Five Keys Sites
<input type="checkbox"/>	No negative COVID-19 test result required to end 10-day COVID-19 isolation	<ul style="list-style-type: none">Test may be requested if you wish to return between days 6-10, but cannot be required

Additional risk assessments and reviews according to CalOSHA standards:

- Cluster or Minor COVID-19 Outbreak:
https://www.dir.ca.gov/title8/3205_1.html
- Major COVID-19 Outbreak:
https://www.dir.ca.gov/title8/3205_2.html



COMPANY TRANSPORTATION: Know Your Rights

For programs like FireCrew and CalCrew in Southern California or Home Free and the Self-Determination Project School on Wheels in Northern California where company-provided transportation occurs, CalOSHA outlines [specific hygiene and safety practices inside vehicles](#) to compliment the cleaning, screening, physical distancing and face covering use already in place to keep our staff safe.

Until February 3, 2025 [CalOSHA section §3205.3](#) applies.

[Assignment of transportation](#)

We will prioritize shared transportation assignments in the following order:

- Employees residing in the same housing unit will be transported in the same vehicle.
- Employees working in the same crew or worksite will be transported in the same vehicle.
- Employees who do not share the same household, work crew or worksite will be transported in the same vehicle only when no other transportation alternatives are possible.

[Face coverings](#)

We will ensure that the:

- Vehicle operators and any passengers are provided face coverings to wear if they wish.

[Excluding Symptomatic Staff](#)

We will exclude drivers and riders with COVID-19 symptoms prior to boarding shared transportation.

[Ventilation](#)

We will ensure that vehicle windows are kept open, and the ventilation system set to maximize outdoor air and not set to recirculate air. Windows do not have to be kept open if one or more of the following conditions exist:

- The vehicle has functioning air conditioning in use and the outside temperature is greater than 90 degrees Fahrenheit.
- The vehicle has functioning heating in use and the outside temperature is less than 60 degrees Fahrenheit.
- Protection is needed from weather conditions, such as rain or snow.
- The vehicle has a cabin air filter in use and the U.S. EPA Air Quality Index for any pollutant is greater than 100.

COVID-19 Exposure Communication Plan

We rely on employees, guests and clients to self-report their COVID-19 symptoms, possible exposures and other COVID-19 to the safety team and want you to feel safe and secure knowing there will not be any retaliation for sharing this information with us. We are committed to remaining discreet while embracing the due diligence Five Keys has to the community, which is to let others know if we believe a site you work at or attend for school has experienced a risk of exposure.

We will never share the name of any individual who discloses COVID-19 symptoms when sending exposure communications to partners, students and staff. Please note, we may be required to share your information with the local health department based on the specific rules in the county where your office or classroom resides.

STAFF Known Exposures (Close Contact)	Five Keys Safety Coordinator will let affected staff know their status and rights either by email or by posting written communication in central location (near Labor Law posters)
STAFF Known Exposure (General)	Five Keys Safety Coordinator will let affected staff know their status and rights either by email or by posting written communication in central location (near Labor Law posters)
Students, Clients, Guests	Five Keys is strongly recommended but not required to notify status of exposure.

MANAGERS | Restocking PPE & Sanitation Supplies

Ordering a Resupply of PPE or COVID-related Inventory

Staff should request these items through the standard [Five Keys Supply Order Form](#).

Five Keys is centralizing the purchasing of masks, gloves, disinfectant wipes and other COVID-19-related safety materials.

To avoid the need for emergency purchases by individuals, please reorder supplies before they run out. We suggest documenting what inventory is used in the first few weeks of school or return to in-person case management and use that to inform your reordering each month.

Receiving a Resupply of PPE or COVID-related Inventory

Managers should continue initialing order form requests as usual. For COVID-related requests managers will also need to pick up orders in person at a regional distribution center.

We strongly encourage managers to prescribe proactive PPE inventory requests among their staff to (1) prevent emergency supply purchasing and (2) to synchronize your distribution pickup efforts. Inventory requested should be supported by student engagement reports. Check with your Superintendent if you have any questions about how to receive COVID-19 supplies.

NorCal Regional Distribution Center
320 13th Street
2nd Floor
Oakland, CA 94612

SoCal Regional Distribution Center
111 S. Walnut Grove Ave
San Gabriel, CA 91776

Securing PPE or COVID-related Inventory On Site

As PPE and cleaning supplies continue to be difficult to source, we ask for all staff's support in keeping it secure for use during Five Keys programming. Managers are to ensure distributed supplies are kept in a secure location when staff are not in the room so that they are not mistakenly taken by partner agencies or guests outside of business hours. [If cleaning supplies and PPE cannot fit inside a locked cabinet inside the classroom or office, please request a locked storage tote for your site, label it to say 'Property of Five Keys' and indicate it as a COVID-19 purchase on the supply order form.](#) Managers will address any discrepancies between if PPE inventory requested in an email to their Superintendent if is out of line with the number of students or guests served at a site.

