

## **COVID-19 Prevention Program (CPP) for:**

### **Our Lady of Perpetual Help School**

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

**Date: January 28, 2021**

#### **Authority and Responsibility**

Dr. Douglas Rynerson, Principal 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.

#### **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 and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: Reporting any hazardous situations they may observe as well as any anecdotal information regarding Parents or students who may have been exposed to or tested positive for Covid-19

#### **Employee screening**

- Employees are instructed to stay home if exhibiting any symptoms related to Covid-19. All employees are screened for temperature on arrival. Any individual reading above 100.4 degrees is not permitted on campus.

#### **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 Covid-19 committee will inspect the premises daily. (D Rynerson, M. Mongan, and A. Avalos) Procedures and protocols will be evaluated for employment with fidelity. Any breaches of protocol will be corrected immediately. Any employee who observes a hazard or a failure to follow protocol is instructed to notify any committee member immediately and corrective action taken.

## **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:

- Teachers with no students in in-person instruction may work from home or in their empty classroom depending on their instructional needs and personal discretion.
- Teachers with students present for in-person instruction will maintain minimum 6-foot distancing of desks, mask wearing, and while minimizing student contact at all times. Any individual reading above 100.4 degrees is not permitted on campus.
- Visitors are not admitted to the property unless necessary and are subject to the same screening as employees. Any individual reading above 100.4 degrees is not permitted on campus. Visitors wait in exterior areas and are kept out of office or classroom areas unless necessary.
- Students arriving on campus are required to complete a health affidavit and have their temperatures checked. Any individual reading above 100.4 degrees is not permitted on campus.
- Signs indicate the necessity of mask wearing, following one-way hallway travel, and 6-foot distancing. Waiting areas have floor signs indicating where to wait to maintain 6-foot distancing.
- Students who come for in-person instruction are staggered on arrival through a car line, breaks and lunches are staggered and distanced, departure is staggered. Students stay in stable cohorts of no more than 12 throughout the day.
- Teachers do not congregate in the staff room, breaks and lunches are in their individual rooms.

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. We have provided 5 face masks and a face shield to each teacher doing in-person instruction. We have provided 3 face masks to each student. Masks are expected to be washed between uses by the teacher or student.

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.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19.

## Engineering controls

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

We will cancel any event in which we cannot maintain social distancing.

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

- Work with open windows and doors where practical except in circumstances where the amount of outside air needs to be minimized due to other hazards, such as heat and wildfire smoke.
- Ventilation systems will be kept serviced and clean.
- Hepa filtration systems installed in all classrooms and office.

## Cleaning and disinfecting

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

	Frequency	Person(s) Responsible
Workspace ( <i>i.e., classrooms, office</i> )	At the end of each day	Maintenance
Appliances ( <i>i.e., refrigerators, microwaves</i> )	Daily	Maintenance  <i>*Note: Staff will wipe down after each use</i>
Electronic Equipment ( <i>i.e., copy machines, shared computers/devices, printers, telephones</i> )	At the end of each use and day	Office Staff  <i>*Note: Staff will wipe down after each use</i>
Student and Teacher Restrooms	Twice a day	Maintenance
Faucets	Twice a day	Maintenance
Common Areas ( <i>i.e., Hall, Resource Rooms, Conference Rooms, etc.</i> )	At the end of each use and day	Maintenance

		<i>*Note: Staff will wipe down after each use</i>
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Should we have a COVID-19 case in our workplace, we will implement the following procedures: Faculty, staff, and students will be monitored throughout the day for obvious signs of illness. Students, faculty, and staff with a fever of 100.4 degrees or higher, who show coughing, fatigue or shortness of breath, or who display other COVID-19 symptoms will be sent home. Any students, faculty, or staff exhibiting symptoms will immediately be removed from the classroom and wait in an isolation area located in the hall until they can be transported home or to a healthcare facility, as soon as possible.

The following plan will be put into place immediately upon notification to the school that any member of the school community (faculty, staff, student, or visitor) tests positive for, or has symptoms consistent with COVID-19:

1. Immediate separation of the case from the school community to self-isolation at home if notification occurs while the case is on-site. The plan must allow for temporary, on-site isolation (with the wearing of a surgical mask) of the case if arrangements are needed for the person to return to their home.
2. Fact-sheets or other informational materials are to be given to the case (or appropriate family member/s if the case is a student) covering regulations governing self- isolation and links to sites with further information.
3. Initiate the School Exposure Management Plan
  - a. Identify person(s) exposed to case(s) at school
  - b. Immediate quarantine of exposed employees and/or students
  - c. Disinfect all areas the case(s) came in contact with as well as all common areas on campus, when necessary

If OLPH has a confirmed positive case of COVID-19, we will follow all additional county public health procedures and complete the ADLA COVID-19 Report Form and Instructions to report it to the Archdiocese. A cluster of cases (three or more cases within 14 days) must be reported to the Department of Public Health and may result in the closure of campus and return to distance learning for an appropriate period of time.

**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. There will be no sharing of said equipment. Each person will maintain their own workspace and there will be no sharing of equipment. Each individual is expected to disinfect their own workspace. Disinfecting agents are provided for this activity.

OLPH will do the following to limit sharing:

- Keep each child’s belongings separated and in individually labeled storage containers, cubbies or areas. Ensure belongings are taken home each day to be cleaned.

- Ensure adequate supplies to minimize sharing of high-touch materials (art supplies, equipment, etc.) to the extent practicable or limit use of supplies and equipment to one group of children at a time and clean and disinfect between uses.
- Avoid sharing electronic devices, clothing, toys, books and other games or learning aids as much as practicable.
- Whenever possible, OLPH will try to be “paperless” and submit assignments and work digitally to reduce contact exposure.

### **Hand sanitizing**

In order to implement effective hand sanitizing procedures:

Students and staff will be given frequent opportunities to wash their hands for 20 seconds with soap, rubbing thoroughly after application and using paper towels to dry hands thoroughly. Hand dryers will not be used. Frequently scheduled mandatory handwashing breaks (especially for younger students) will occur at minimum:

- Before and after eating
- after using the restroom
- after outdoor play
- before and after any group activity.

Staff will model and monitor frequent and proper handwashing, especially in lower grades where bathroom time is an opportunity to reinforce healthy habits.

### **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. Masks and face shields are provided to all staff and students.

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. Appropriate protective suit and respiratory protection is provided for any employee engaged in disinfecting activities.

### **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.
- 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:

- Who employees should report COVID-19 symptoms and possible hazards to the Principal or his Administrative Assistant, in person, via text, or through email.
- That employees can report symptoms and hazards without fear of reprisal.

- All employees, including employees with medical or other conditions that put them at increased risk of severe COVID-19 illness are allowed to work from home if they prefer.
- Employees can access COVID-19 testing through their medical provider from their benefit package.
- 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. If testing is required, it will be done at no cost to the employee and during work hours if possible.
- COVID-19 policies and procedures are posted at the entrance of the school, on our website, and regularly reminded in staff 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've demonstrated that the COVID-19 exposure is work related. This will be accomplished by allowing employees to complete their work from home when possible. Employees who are unable to perform their functions will be on paid leave according to our benefits package. Extra sick time will be extended where necessary.

- 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.
- Complete the ADLA COVID-19 Report Form and Instructions to report it to the Archdiocese.

## 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.
    - Doctor's clearance to return to school/work
  - 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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Dr. Douglas Rynerson  
Principal

01/29/2021  
Date





## 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			
Adequate disinfecting equipment			
<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 (not shared, available and being worn)</b>			
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.

**Date:**

**Name of person conducting the investigation:**

<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**

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**

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.

If OLPH has a confirmed positive case of COVID-19, we will follow all additional county public health procedures and complete the ADLA COVID-19 Report Form and Instructions to report it to the Archdiocese. A cluster of cases (three or more cases within 14 days) must be reported to the Department of Public Health and may result in the closure of campus and return to distance learning for an appropriate period of time.

### **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.**