# COVID-19 Prevention Program (CPP) for Holy Family School

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

**Date: January 26, 2021** 

## **Authority and Responsibility**

Darcie Girmus 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: Employees may report concerns to the principal or school nurse.

#### **Employee screening**

We screen our employees by: employees are encouraged not to come to work if they have any symptoms consistent with COVID-19 or have had direct exposure. On-site employees must submit a daily email from the school nurse. 25% of on-site employees are tested every two weeks for COVID-19.

#### Correction of COVID-19 Hazards

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

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

Individuals are identified as being responsible for timely correction.

Follow-up measures are taken to ensure timely correction.

### **Control of COVID-19 Hazards**

### **Physical Distancing**

Where possible, we ensure at least six feet of physical distancing at all times in our workplace by:

- 50% of employees work off-site
- Visitors are not allowed past the office doors of the school.
- Signs and floor markings indicate where employees and students should be located or their direction and path of travel.
- Staggered arrival and departure times of students.
- Staggered lunch schedule.
- Outdoor eating areas for faculty and students.
- Desks spaced to the greatest distance possible.
- Sneeze guards around students and faculty.

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. Employees may bring their own face mask or wear one provided by the school. We have paper, KN95, or cloth masks that they may use and discard or keep. Students wear their own mask; however, we also have on hand paper and cloth masks for students.

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: offices have been reconfigured to have only one occupant.

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

Bi-polar ionization generators have been installed.

Merv-31 filters are in use and they are maintained/replaced on a contract basis with the air conditioning company.

Classrooms have override switches for the fans and the fans run while the classrooms are in use.

All windows that are designed to open may open.

Doors are propped open.

Interior spaces have been outfitted with commercial grade HEPA units.

#### Cleaning and disinfecting

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

- Students must wash hands upon entering the classroom.
- Students must wash hands before and after recess.
- Cleaning supplies have been distributed in all classrooms and additional supplies are available in the
  office.
- Students wipe off their desk at the end of the day.
- The nurse and assistants (in TK-2) wipe down frequently touched surfaces midway through the day.
- We have a bi-polar ionization cannon which is used in the building after hours.

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

The individual will be isolated in the nurse's office until they can go home. The nurse's office door is closed off from the rest of the building and is outside door is open. The nurse wipes down the table following visitors and the room is disinfected with a UV light. The room is sprayed with the bi-polar cannon after school hours.

#### 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 employee. Students and employees have their own electronic devices. In the GAINS room, the teacher wipes down the surface between students. Toys are wiped down between users.

#### Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Taught students how to wash hands appropriately.
- Made sure each classroom has a functioning sink, soap, and no-touch paper towel dispenser.
- Provide time for student handwashing.
- Allow employees to wash hands as desired.
- Provide hand sanitizer throughout the building.
- Have posted Handwashing signs throughout the building.

#### 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.

Gloves, masks, and face shields are available to all employees.

# **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.

• Quarantined and work off-site for 14 days or for 10 days with a negative COVID-19 test.

### **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 can report illness or concerns to nurse or principal without fear of reprisal.
- Employees can access COVID-19 testing at their physician or a free covid-testing center. The nurse can assist them in finding a location.
- In the event we are required to provide testing because of a workplace exposure or outbreak, we will
  communicate the plan for providing testing via email and inform affected employees of the reason for
  the testing and the possible consequences of a positive test.
- Teachers and employees have been and will continue to be informed of our safety protocols at faculty meetings and through email.

### **Training and Instruction**

We will provide effective training and instruction that includes:

- Employees have been trained regarding safety protocols at faculty meetings and through email.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws is shared with employees where applicable.
- Students have been instructed on what the coronavirus is, proper handwashing and physical distancing.
- The fact that:
  - o 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 or for 10 days with a negative COVID-19 test.
- 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 employees were provided with 10 sick days.
- Providing employees at the time of exclusion with information on available benefits.

### Reporting, Recordkeeping, and Access

It is our policy to:

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

## **Return-to-Work Criteria**

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
  - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
  - o 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.
- 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 with a negative covid test, or 14 days from the time the order to quarantine was effective.

## **Appendix A: Identification of COVID-19 Hazards**

All persons, regardless of symptoms or negative COVID-19 test results, will be considered potentially infectious. Particular attention will be paid to areas where people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not. For example: meetings, entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

Evaluation of potential workplace exposure will be to all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

Person conducting the evaluation: Darcie Girmus

Date: November 30, 2021

Name(s) of employee and authorized employee representative that participated: Jennifer Larkin

Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards	Places and times	Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers	Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation
Faculty Lounge	Weekly Inspection	Exposure risk if more than one faculty member gather or eat together.	Signage, Stacking of Chairs, HEPA unit
Restrooms	Daily Inspection		Signage, Doors propped open, Ventilation
Classrooms	Daily Inspection	Exposure risk through air.	Separation of desks to the greatest extent possible, sneeze guards, HEPA units, Windows open, Door propped open, and AC fan on

# **Appendix B: COVID-19 Inspections**

[This form is only intended to get you started. Review the information available at <a href="www.dir.ca.gov/dosh/coronavirus/">www.dir.ca.gov/dosh/coronavirus/</a> for additional guidance on what to regularly inspect for, including issues that may be more pertinent to your particular type of workplace. You will need to modify form accordingly.]

Date: [enter date]

Name of person conducting the inspection: [enter names]

Work location evaluated: [enter information]

Exposure Controls	Daily	Office Staff	Date Corrected
Engineering			
Sneeze Guards			
Door/window open			
Fan on			
HEPA unit			
Administrative			
Physical distancing			
Surface cleaning and disinfection			
Cleaning supplies			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			