

# Model COVID-19 Prevention Program (CPP)

With some exceptions, all employers and places of employment are required to establish and implement an effective written COVID-19 Prevention Program (CPP) pursuant to an Emergency Temporary Standard in place for COVID-19 (California Code of Regulations (CCR), Title 8, section 3205(c)). Cal/OSHA has developed this model program to assist employers with creating their own unique CPP tailored to their workplace.

Employers are not required to use this program. Employers may create their own program or use another CCP template. Employers can also create a written CCP by incorporating elements of this program into their existing Injury and Illness Prevention Program (IIPP), if desired. Cal/OHA encourages employers to engage with employees in the design, implementation and evolution of their COVID-19 Prevention Program.

Using this model alone does not ensure compliance with the emergency temporary standard. To use this model program effectively, the person(s) responsible for implementing the CPP should carefully review:

- All of the elements that may be required in the following CCR, Title 8 sections:
  - 3205, COVID-19 Prevention
  - 3205.1, Multiple COVID-19 Infection and COVID-19 Outbreaks
  - 3205.2, Major COVID-19 Outbreaks
  - 3205.3, Prevention in Employer-Provided Housing
  - 3205.4, COVID-19 Prevention in Employer-Provided Transportation to and from Work
  - The four **Additional Considerations** provided at the end of this program to see if they are applicable to your workplace.
- The additional guidance materials available at [www.dir.ca.gov/dosh/coronavirus/](http://www.dir.ca.gov/dosh/coronavirus/)



November 2020

# COVID-19 Prevention Program (CPP) for Salesian College Preparatory

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

**Date: 12/15/2020**

**Authority and Responsibility, Marylou Flannery, 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 (**see HR/Eileen Howard for Report**)
- 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.
- **Prior to writing our School Reopening Plan in October, 2020, the entire plant/facility was evaluated in terms of maximum room/area capacities (for purposes of social distancing) which not only included classrooms, but meeting areas, as well as bathrooms, eating areas(café) etc. All windows were checked to make sure they were operational to maximize air flow in buildings.**

### Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: **Survey distributed to all employees on 1/6/21 to identify any hazards. Material from the survey will be added to Appendix A, and then reviewed by HR, the Principal, and the Facilities Coordinator in a timely fashion. Appendix B Inspections will occur as needed.**

### Employee screening

Employees **self-screen according to CDPH/CDC guidelines prior to work daily. Non-contact thermometers are available in the front office for additional screening if needed.**

## 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 Principal, Marylou Flannery, HR, Eileen Howard, and Henry Moe, Facilities Coordinator, will evaluate all hazards identified, and attempt to remedy those in a timely manner to the best of our ability.**

## **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:

- **Eliminating the need for workers to be in the workplace – e.g., telework or other remote work arrangements has been approved. Employees use Signup.com to indicate if they working on campus or at home.**
- **Reducing the number of persons in an area at one time (signs are posted to limit the number of employees in the breakroom to no more than three; limits for student bathrooms to no more than 4), including visitors.**
- **Visual cues such as signs and floor markings to indicate where employees and others can stand or sit (outside seating is labeled accordingly reflective of social distancing).**
- **Staggered arrival, departure, work, and break times, as well as designated door entry per grade level of students**
- Non-essential Visitors will be restricted from daily access to the campus.
- No one will be allowed onto campus without executing a waiver that among other items requires that the person pass a self-check screening for COVID symptoms. Ingress and egress routes will be clearly delineated and the students, faculty, and staff informed, with the goal of maximizing the use of all stairways and entrance doors which will optimize traffic flow.

Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved. Classroom desk/student seating is at a minimum of five feet apart. Teacher desks are at a minimum of six feet from a student desk.

### **Face Coverings**

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors and outdoors on the school campus. When outdoors, employees should maintain a social distance of at least 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. **Disposable masks and cloth masks are available at any time in the front office for all faculty, staff and students. Each classroom has a supply of disposable face masks. N95 masks are available upon request for any high risk individual requesting additional protection. Face shields are also available in the front office for any/all faculty/staff.**

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

- When an employee is alone in a room or office.
- 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.

### **Engineering controls**

We implement the following measures for situations where we cannot maintain at least six feet between individuals: **Plastic sneeze guards have been installed in the front office (front office counter and Registrar's Office Window). Plastic sneeze guards have been installed on most teacher desks throughout the school.**

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

**Medical grade Air Purifiers (H-13 HEPA filters) have been installed in every office, classroom, gym, café and breakrooms throughout the school. Staff is instructed to put air purifiers on daily as well as open windows in every office/classroom or other occupied areas to maximize airflow throughout the school.**

### **Cleaning and disinfecting**

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

An additional janitor will come on campus every evening after the regular daily cleaning has been completed. EPA approved list 'N' cleaning materials for use against Covid 19 will be utilized throughout the campus. The extra janitor will use the EvaCleaning system (spray) on desks, door handles, cafe tables, chairs, gym bleachers, all bathrooms etc. to disinfect the campus every evening.

Cafe tables and chairs will be sprayed using the EvaCleaning system daily after break (when the Cafe is open for students to use).

Additional cleaning supplies (wipes, spray bottles with disinfectant, paper towels etc.) will be in every classroom, as well as hand sanitizer. Students are encouraged to bring in disinfectant wipes to wipe their desks down, or just use available classroom disinfectant supplies at any time. **Wipes are available in offices, breakroom etc.**

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

**Salesian will follow all CDC and CCHS guidelines for cleaning and disinfecting any/all areas where a positive Covid-19 case/infected individual was present. Relevant PPE will be distributed to the janitorial staff to use in the cleaning/disinfecting process.**

An isolation room has been established on the first floor in case a student or staff member with symptoms needs to wait for transport.

### **Shared tools, equipment and personal protective equipment (PPE)**

PPE must not be shared, e.g., gloves, goggles and face shields. All classrooms have been provided with gloves and disposable masks.

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 **employees themselves.**

**Disinfectant wipes are readily available, as well as spray disinfectant and paper towels.**

**EvaCleaning/spraying will be done nightly throughout the entire campus (spraying door handles, stair rails etc.)**

**Water fountains are not available for use so students/employees must bring a personal water bottle from home pre-filled with water.**

Sharing of school vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users.

School Vans will leave the middle seat and the front passenger seat empty, windows will be open, and drivers and students must properly wear masks during the entire ride. Hand sanitizer will be available in every van. Vans will be sprayed with disinfectant after every use and every evening.

## Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- **All bathrooms are equipped with Anti-bacterial soap and touchless towel dispensers.**
- **Hand sanitizer dispensers (touchless) are located outside, as well as in the hallways throughout the main building.**  
**Employees are encouraged to wash their hands thoroughly for 20 seconds (signage posted in breakroom, all bathrooms). Employees can take as much time as needed to thoroughly wash hands.**
- **Hand sanitizers are available in every classroom, office, meeting room etc. throughout the entire campus. All hand sanitizers used on campus meet recommended CDPH/CDC requirements in terms of alcohol content.**

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

We evaluate the need for PPE (such as gloves, and face shields) as required by CCR Title 8, section 3380, and provide such PPE as needed. Goggles are available upon request.

All janitors cleaning in the building will be provided with gloves, masks and face shields if needed, as well as N95 masks if requested.

Janitorial staff cleaning an infected room (after Positive Covid-19 test) will be given full PPE clothing (gown, hooded jacket etc.), as well as goggles, N95 mask and Face Shield to wear while cleaning/disinfecting the infected room.

## 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 inform the Principal, HR, and Zuleyma Guardado/Contact Tracing:

Contact tracing will be initiated by Zuleyma Guardado if a case is reported. A binder will be maintained of intake forms submitted to the Health department, as well as any/all responses. We will follow the Schools Guidance for Suspected or Confirmed Covid-19 cases from Contra Costa Health Services Department.

- **COVID-19 testing will be scheduled monthly on campus at no cost to employees during their working hours. Additional free testing sites/locations/appointment information will be available from Zuleyma Guardado for any interested employee.**
- **Employees are afforded two weeks of sick leave time due to Covid-19 related illness (per Federal Cares Act)**

## 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 Eileen Howard, HR, Marylou Flannery, Principal, and Zuleyma Guardado, Contact Tracing.
- Employees can report symptoms of Covid-19 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: Medical waivers to remain at home and work remotely must be submitted to Eileen Howard, HR, subject to approval by the Principal.

- Where testing is not required, how employees can access COVID-19 testing:
- **Additional free testing sites/locations/appointment information will be available from Zuleyma Guardado for any interested employee.**
- 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. **We will contract with PMH Labs (conducts monthly testing on campus for Salesian) to set up testing for the school community if an outbreak occurs.**
- 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: Principal or HR will have an updated report on how hazards are being addressed as well as any policies that have been implemented.

## 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 (posted Staff Breakroom).
- 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 facecoverings. (Signage posted throughout campus)
- 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. (Signage posted throughout campus).
- 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 (Hand Washing Signs posted in all staff and student bathrooms throughout campus promoting proper handwashing).
- 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.
- **\*\* Providing relevant webinars, PowerPoint presentations from the CCCOE, CDPH, or CCHS to all faculty/staff on all topics listed above\*\***

**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:

A Medical Assistant on staff has recently completed a certified Contact Tracing course and will be designated as a County Health Department contact person for the school. The Principal is also a member of the Covid Response Team at Salesian and is another contact person for CCHS.

Employees who are sick or exhibiting symptoms of Covid-19 are directed to stay home and follow CC Health Services Guidelines for returning to work after isolation or Quarantine (see SCP Covid-19 Rules and Regulations for Employees, 6/29/2020)

Students must avoid all physical contact with each other, including celebrations, handshakes, high-fives, etc.

Parents must check their student every day, and all Salesian employees and off campus coaches must also complete a self-check, and if any of the following symptoms ("Symptoms") are present, the student or employee as the case may be must remain at home and not attend School until such time as the Symptoms have not been evident for at least 3 days:

- Fever above 100 degrees Fahrenheit (Touchless Thermometers available in front office) or chills
- Shortness of breath or difficulty breathing
- New loss of taste or smell
- Dry cough
- Congestion, sneezing or runny nose not related to a previous condition
- Sore throat
- Fatigue
- Muscle or body aches
- Headache
- Nausea or vomiting
- Diarrhea

There will also be visual assessments by classroom teachers, staff, or admin, as well as a possible secondary temperature screening.

- 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 **employer provided sick leave benefits**.
- 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.

## 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 14 days** have passed since COVID-19 symptoms first appeared.
  - COVID-19 cases that tested positive but never developed COVID-19 symptoms will not return to work until a minimum of **14** 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 14 days from the time the order to isolate was effective or the date of a positive test, or 14 days from the time the order to quarantine was effective.
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**Marylou Flannery, Principal**

## 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: Marylou Flannery (via survey sent to all faculty/staff)**

**Date: January 6, 2021**

**Name(s) of employee and authorized employee representative that participated: all employees participated**

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
Not all classroom windows are being opened during instruction	During school day	Teachers/staff	Provide foam window sill protectors to allow windows to stay open (and not blow shut)
Copy room, staff offices	During school day	Teachers/staff	Put up more signage in offices, copy room to encourage mask wearing, social distancing
Outside seating	During school day at break and lunch	Teachers/staff	More announcements about available seating outside and the need to maintain social distancing
Outside and hallways	During school day, lunch and break	Teachers/staff	Revise assistance schedule during breaks ; additional training for staff

## Appendix B: COVID-19 Inspections

[This form is only intended to get you started. Review the information available at [www.dir.ca.gov/dosh/coronavirus/](http://www.dir.ca.gov/dosh/coronavirus/) 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:** Ongoing since October 20, 2020

**Name of person conducting the inspection:** Henry Moe, Facility Coordinator

**Work location evaluated:** School plant, 2851 Salesian Avenue, Richmond, CA 94804

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			
<b>[add any additional controls your workplace is using]</b>			
<b>[add any additional controls your workplace is using]</b>			
<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>[add any additional controls your workplace is using]</b>			
<b>[add any additional controls your workplace is using]</b>			
<b>PPE (not shared, available and being worn)</b>			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
<b>[add any additional controls your workplace is using]</b>			

## 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: ongoing since 10/20/2020 (binder kept in office of Zuleyma Guardado of contact tracing)**

**Name of person conducting the investigation: Zuleyma Guardado**

<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>	
<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>			

<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.