

# 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/OSHA 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 La Purísima Concepción Catholic School

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

**Date: January 22, 2021**

## Authority and Responsibility

**Rigoberto Gallardo, 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.
- **Follow protocols issued by the Santa Barbara Public Health Department, California Department of Public Health and Center for Disease Control.**

## Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: **Communicating either via email, phone call, text or in person the identification or evaluation of COVID-19 hazards to either the school's Principal, Pre-school Director or Administrative Assistant.**

## Employee screening

We screen our employees by:

- **Employees are directed to not to come to work if they have COVID-19 symptoms or have been exposed to a person who has tested positive for COVID-19.**
- **Direct screening of employees takes place when they come to work before entering classrooms and/or the school office.**
- **Face coverings are required on campus and during screening by both screeners and employees and. Temperatures are measured with non-contact thermometers.**
- **Twenty-five percent of our employees is tested on a bi-weekly basis. Our staff is scheduled on a bi-weekly rotation that has all our employees test approximately every two months.**

## 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 hazards was assessed and corrected by the Principal Rigoberto Gallardo and Preschool Director Terese Muñoz-Hill with School Reopening and Operation Plans under CDC, CDPH and SBCPHD health guidelines. Other agency guidance that was considered was from the CDE and SBCEO. All corrections, practices and procedures were addressed by July 2020 for the preschool and by October 2020 for the school. Follow-up measures and maintenance are implemented by staff to make sure everything is updated according to changes in policy and maintain compliance. Our administration will continue to receive, assess and correct COVID-19 Hazards as they arise.

## 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:

- Elective teachers/instructors practice remote teaching arrangements via Zoom when applicable. Other staff members can practice distance learning or telework when applicable.
- Reducing the number of persons in an area at one time, including visitors.
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Staggered arrival, departure, work, and break times.
- Adjusted work processes or procedures are implemented to increase social distancing between staff, faculty and children. Recess and lunch times are staggered to reduce staff and children interaction by limiting the amount of people in the playground and lunch areas. This also allows for the separation of groups by zones, increasing physical distancing.
- Teacher work spaces are at least six feet apart from student desks. Student desks are at least four feet apart from each other.
- Student desks have desk shields that provide another barrier between all who are present in the classrooms
- Staff and children are in assigned classes within cohorts throughout the length of the school day. These classes are not permitted to comingle with each other and neither are the cohorts as well.
- [Reference section [3205\(c\)\(6\)](#) for details]

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. **La Purísima Concepción Catholic School (LPCCS) has the following mask in stock and available to our staff when need: Disposable Medical Masks, Cloth Face Masks, KN95 Masks and Face-Shields. Although, our staff utilize their own personal masks the masks in stock are available to staff and teachers anytime during operating hours.**

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 wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.

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:

- **Desk Shields are installed on student desks since they are at least four feet apart.**
- **Our school office front desk has Plexiglas partitions installed between LPCCS staff and visitors.**

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

- **At least one classroom door will remain open along with at least one classroom window during school hours.**
- **The school office door will remain open along with at least one office window during school hours.**
- **Each classroom runs a Blueair system with an ACH of 5 during school hours.**

### **Cleaning and disinfecting**

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

- **Staff training has been provided and is reviewed when necessary on our school's cleaning and disinfecting measures.**
- **Sanitization procedures will take place after the school day has concluded according to CDC and CDPH guidelines. Employees and our custodian will clean and disinfect routinely throughout the day.**
- **All classrooms will be thoroughly sanitized at the end of the school day and restrooms will be cleaned throughout the day. Preschool staff will routinely clean the restrooms throughout the day.**
- **Our school custodian will also be available to sanitize the facilities on a routine basis.**
- **Cleaning and disinfectant supplies will be in each classroom for desks and chairs and other high contact surfaces. Teachers and classroom aides will routinely disinfect working surfaces throughout the school day.**
- **Staff areas, such as the office and staff lounge, is routinely disinfected after the business of preparing materials and meals for our programs.**
- **Outdoor eating and sitting areas are designated to one class per day. These surfaces will be routinely cleaned and disinfected after each use.**
- **The Play Structure equipment will be disinfected at the conclusion of each recess.**
- **If the school supplies can be disinfected before and after use, this will also take place.**

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

**When a student, teacher or staff member tests positive for COVID-19 and had exposed others at the school, the staff will disinfect and clean the classroom and spaces where the known case spent significant time. The classroom or area is isolated, then staff, including custodian, disinfect**

**immediately with disinfectants such as Lysol, Clorox Disinfectant or something equivalent. At the conclusion of the day the classroom or area gets another disinfecting treatment with a backpack fogger.**

### **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 **following a schedule that has staff and faculty implement a checklist of sanitization activities. In our classrooms and office spaces our classroom, playground and preschool equipment are disinfected with CDC and CDPH approved products on a schedule that is synced with our break, recess, lunch and dismissal times.**

### **Hand sanitizing**

In order to implement effective hand sanitizing procedures, we:

- **Increased handwashing facilities.**
- **Encouraging and allowing time for employee handwashing before and after lessons, learning activities, breaks, recess and lunch.**
- **All our classrooms and shared work spaces are provided hand sanitizer that don't include methanol (i.e. methyl alcohol).**
- **Employees are encouraged to wash their hands for at least 20 seconds each time.**

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

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

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained.

**Our teachers and staff are expected to wear face masks and/or face shields when applicable throughout the day on campus. Our staff has access to our stock of PPE that includes, gloves, face masks, face shields, disinfectants/cleaners and hand sanitizer.**

## **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:

- **All employees are asked to test routinely, our school recommends that the services from Logistics Health Incorporate (LHI: <https://lhi.care/start>). Employees may choose to have the testing done during work hours if they chose to, they may also use alternative testing services if they prefer.**
- **Appendix C will be completed by either Principal Rigoberto Gallardo or Preschool Director Terese Muñoz-Hill when the need arises.**

## **System for Communicating**

Our goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and that it includes the following information:

- **Employees should report COVID-19 symptoms and possible hazards to the school's**

**Principal, Preschool Director or Administrative Assistant. This is expected to be done in a timely manner in person, by phone or email whether they are on or off the work site.**

- That employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- **All employees are asked to test routinely in accordance to our School Reopening Plan. Our school recommends that the services from Logistics Health Incorporate (LHI: <https://lhi.care/start>). Employees may choose to have the testing done during work hours, they may also use alternative testing services if they prefer.**
- 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.
  - **When an employee tests positive for COVID-19 and had exposed others at the school, we will implement the following steps:**
  - **1. Contact SBCPHD Community Health Nurse/Disease Control at 805-681-5280**
  - **2. Isolate the case and exclude from the school until criteria for a return have been met.**
  - **3. Send our Notice of Potential Exposure to COVID-19 to staff members of a known COVID-19 case. Appendix A will also be provided to inform employees of benefits that are available.**
  - **4. All staff and faculty have the option of testing through community testing offered in the county of Santa Barbara through LHI (<https://lhi.care/covidtesting>). An employee can opt for getting tested by their personal health care professional under their own medical insurance.**
- Information about COVID-19 hazards employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures.

## **Training and Instruction**

We will provide effective training and instruction 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 **implementing Appendix A of AB 685 Notice of Potential of COVID-19 Exposure – Benefits Available in our Administrative Handbook.**
- 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.
    - COVID-19 symptoms have improved.
    - At least 10 days have passed since COVID-19 symptoms first appeared.
  - COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
  - A negative COVID-19 test will not be required for an employee to return to work.
  - If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.
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