

St. Louis of France, La Puente

1/25/2021

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 CPP template. Employers can also create a written CPP 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/



November 2020

COVID-19 Prevention Program (CPP) for **St. Louis of France School**

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

Date: Revised 3/1/2021

Authority and Responsibility

Lorraine Ovalle 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: **discussing concerns in the re-opening plan prior to its publication, suggesting and implementing adjustments in the procedures called for in our plan and noting concerns with administration.**

Employee screening

We screen our employees by: **self-screen according to CDPH guidelines prior to arrival at work and directly screening employees when they come to work. Temperature administration using non-contact thermometers and review of health screening app.**

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:

Administration will assess all hazards in a timely manner. Notification to all affected staff within an hour. Appropriate communications for all affected stakeholders (parents, students, parish community) and authorities will likewise be completed by administration. Any disciplinary action will be addressed within 72 hours, as appropriate, and accountability will be developed and determined in collaboration with Human Resources and the staff requiring 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:

- **Staff may work from home.**
- **The office may have only 1 visitor at a time with distancing reminders in place. Visitors on campus are not permitted.**
- **Floor markings are placed in the office and quad area with reminders at all entrances to campus.**
- **Plastic barriers installed and desks within classrooms spaced 6 ft. apart.**

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. **Each classroom has a supply of face coverings with additional ones placed in the Wellness Room and the school office. Supply is monitored by administration and staff.**

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: **Solid partition installed in office and around student desks.**

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

- **Filters have been checked and updated as of December 2020**
- **Windows and doors left open as appropriate. (Weather and air quality)**

Cleaning and disinfecting

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

- **Custodial staff will disinfect twice daily using aerosol methods.**
- **Each classroom is supplied with hand sanitizer and cleaning supplies with additional supplies in Wellness Room and the school office.**

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

Wipe down of all affected surfaces with disinfectants provided by Rancho Janitorial followed by an open-air period for 48 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 **wiping down using Rancho Janitorial provided supplies.**

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- **Additional handwashing stations acquired through the Knights of Columbus**
- **Handwashing stations provided for outdoor play area and classroom area.**
- **Staff encouraged to hand wash with students at recess, lunch and transition time.**
- **Hand sanitizers purchased and installed in all classrooms and office areas.**

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.

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:

- **Covid-19 testing will be offered during their working hours.**
- **All information on benefits has been communicated via Human Resources with the principal reviewing it during faculty meetings and**

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 principal or administrative assistant (when the principal is not available) by phone, email, text, or in person.
- 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.
- Employees can test for COVID-19 before or after school during the work week or anytime during the weekend. Employees can see their health care provider or make an appointment with the Los Angeles County operated testing sites: <https://la.fulgentgenetics.com/appointment> or Los Angeles City-supported, CA State-supported and other testing partner sites: <https://covid19.lacounty.gov/testing>
- 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 there is a confirmed case in our community, contact tracing will take place through our small cohort. The small cohort may be asked to move to distance learning for 14 days depending on counsel from the ADLA and the public health officials.
- Strict confidentiality will be kept in reporting cases and in communication with the school.
- **If a faculty member tests positive for COVID-19, he or she must follow home isolation procedures.**
- **Faculty member may return to school when he or she has not had a fever (without the use of**

fever reducing medication) for at least 24 hours and at least 10 days have passed since symptoms first appeared. For persons who never developed symptoms, they may return to school 10 days after the date of testing positive.

- If a faculty member is exposed to or has close contact with someone who is COVID-19 positive, they must follow home quarantine procedures, participate in distance learning, and get tested for COVID-19. He or she may return to school once they quarantine for 14 days from the last date of exposure (regardless of a negative COVID-19 test).

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 **following all laws regarding employee rights including, but not limited to, 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.
- 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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Lorraine Ovalle
Principal

2/17/2021

Date

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: Ms. Lorraine Ovalle, Principal

Date: January 25, 2021

Name(s) of employee and authorized employee representative that participated: Ms. Lorraine Ovalle, Principal

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
Restrooms, Classrooms, front office, Computer Lab, Staff room	7:30-3:30 Weekdays	None	All protocols in place

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/ 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: **January 25, 2021**

Name of person conducting the inspection: **Ms. Lorraine Ovalle, Principal**

Work location evaluated: **Saint Louis of France School, La Puente**

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions	X		
Ventilation (amount of fresh air and filtration maximized)	X		
Additional room air filtration			
Administrative			
Physical distancing	X		
Surface cleaning and disinfection (frequently enough and adequate supplies)	X		
Hand washing facilities (adequate numbers and supplies)	X		
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions	X		
Barrier/partition at front desk	X		
signage	X		
PPE (not shared, available and being worn)	X		
Face coverings (cleaned sufficiently often)	X		
Gloves	X		
Face shields/goggles	X		

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:

Employee (or non-employee*) name:		Occupation (if non-employee, why they were in the workplace):	
Location where employee worked (or non-employee was present in the workplace):		Date investigation was initiated:	
Was COVID-19 test offered?		Name(s) of staff involved in the investigation:	
Date and time the COVID-19 case was last present in the workplace:		Date of the positive or negative test and/or diagnosis:	
Date the case first had one or more COVID-19 symptoms:		Information received regarding COVID-19 test results and onset of symptoms (attach documentation):	

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):

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:			
All employees who may have had COVID-19 exposure and their authorized representatives.	Date:		
	Names of employees that were notified:		
Independent contractors and other employers present at the workplace during the high-risk exposure period.	Date:		
	Names of individuals that were notified:		
What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?		What could be done to reduce exposure to COVID-19?	
Was local health department notified?		Date:	

*Should an employer be made aware of a non-employee infection source COVID-19 status.