

COVID-19 Prevention Program (CPP) for St. Mary of the Assumption School

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

Date: Jan 25, 2021

Authority and Responsibility

The school Principal, Michelle Cox, 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:

- reviewing and sharing questions and concerns during staff meetings and training sessions.
- 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.
- The school's custodial staff has a facility cleaning schedule and checklist that includes cleaning high touch areas such as door handles, light switches, and railings at least twice daily; cleaning shared areas such as picnic tables and restrooms at least twice daily; and cleaning all classrooms daily. All indoor spaces will also be disinfected with a ULV mister before students return to classrooms the next day. The custodian and janitor, along with their supervisor, have reviewed the CDC reopening guidelines for cleaning and disinfecting schools.

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

- reviewing and sharing questions and concerns during staff meetings and training sessions.
- reporting potential hazards to their team leaders, school manager, and/or the school principal.
- documenting identified hazards on the daily facility cleaning schedule.

Upon arrival, children will be greeted with a visual wellness check and have their temperature checked with a no-touch thermometer. Anyone with a temperature over 100°F or with symptoms will be sent home immediately. Parents may pull over to wait for a minute or two to have a second reading taken. If the second reading is normal, then one more reading will be taken to confirm the lower temperature before a child is admitted to campus. If the second reading is consistent with the fever indicated at first, the child will go home immediately.

Employee screening

We screen our employees by:

- Staff members complete a daily health screening, including answering COVID-related health questions and taking their temperature.
- Staff check in and out using the Homebase app, which includes the health screening questions. (Effective January 1, 2021. Prior to January 2021, staff members completed the screenings in a Google form.)
- Staff must wear either a disposable or cloth face mask that covers their nose and mouth. If someone forgets their mask or needs a replacement, a disposable one will be provided. Anyone with a health condition that would prevent them from wearing a mask must bring a note from their physician and will then wear a face shield. When required for instruction, teachers will wear face screens in accordance with *COVID-19 Industry Guidance: Schools and School-based Programs* from the CA Department of Public Health. The guidance states, "In limited situations where a face covering cannot be used for pedagogical or developmental reasons, (i.e. communicating or assisting young children or those with special needs) a face shield can be used instead of a cloth face covering while in the classroom as long as the wearer maintains physical distance from others, to the extent practicable.
- Non-contact thermometers are provided.

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 school office manager and principal will review identified hazards and determine the best course of action to correct the hazard.
- Tasks for correcting the hazard will be assigned to specific employees with a deadline for completion.
- Supplies will be ordered by office staff as needed.
- Areas used by a sick person will be disinfected and cleaned immediately with proper protective equipment.
- This includes, but is not limited to, implementing controls and/or policies and procedures in response to the evaluations conducted and implementing the controls required by the school.

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 redesigning all facilities and procedures to ensure adequate physical distance is maintained.

- Teachers have an 8-foot zone across the front of their room to allow for their movement and instruction while remaining at a distance from students.
- Where 6 feet of distance is not possible, students will be seated 4 feet apart at desks with three-sided desk shields. Floor stickers will be below each seat to remind students of the proper placement of their chairs and desks. Class sizes have been limited to accommodate this spacing.
- Some registered students will zoom into live instruction from the classroom to keep class sizes small.
- Teachers will instruct and practice procedures for lining up and moving through hallways and outside.
- Another room has been redesigned for a staff lounge to make multiple staff spaces, keeping

cohorts separated and allowing more physical spacing.

- In the school office, a plexiglass divider has been added to the front counter and signs inviting only one family at a time to enter are posted. Floor signs also remind visitors to keep the appropriate distance while waiting. 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 the Santa Barbara County Public Health Department (SBCPHD).

- All students and staff must wear either a disposable or cloth face mask that covers their nose and mouth. If someone forgets their mask or needs a replacement, a disposable one will be provided. Anyone with a health condition that would prevent them from wearing a mask must bring a note from their physician and will then wear a face shield.
- When required for instruction, teachers will wear face screens in accordance with *COVID-19 Industry Guidance: Schools and School-based Programs* from the CA Department of Public Health. The guidance states, "In limited situations where a face covering cannot be used for pedagogical or developmental reasons, (i.e. communicating or assisting young children or those with special needs) a face shield can be used instead of a cloth face covering while in the classroom as long as the wearer maintains physical distance from others, to the extent practicable. Staff must return to wearing a face covering outside of the classroom."

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:

- Students will be seated 4 feet apart at desks with three-sided desk shields. Floor stickers will be below each seat to remind students of the proper placement of their chairs and desks. Class sizes have been limited to accommodate this spacing.
- In the school office, a plexiglass divider has been added to the front counter and signs inviting only one family at a time to enter are posted. Floor signs also remind visitors to keep the appropriate distance while waiting.

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

- Increase fresh outdoor air by keeping windows and doors open when weather conditions allow. Windows and doors may not be open if doing so poses a safety or health risk due to poor air quality (due to fire, for example).
- Option of using fans to increase the effectiveness of open windows: Position fans securely and carefully in or near windows so as not to induce potentially contaminated airflow directly from one person over another (strategic fan placement to help draw fresh air into the classroom from open windows or to blow air from the classroom out open windows and doors).

Cleaning and disinfecting

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

- The school's custodial staff has a facility cleaning schedule and checklist that includes cleaning high touch areas such as door handles, light switches, railings, and counters at least twice daily; cleaning shared areas such as picnic tables and restrooms at least twice daily; and cleaning all classrooms daily.
- All indoor spaces will also be disinfected with a ULV mister before students return to classrooms the next day.
- The custodian and janitor, along with their supervisor, have reviewed the CDC reopening guidelines for cleaning and disinfecting schools.
(<https://www.cdc.gov/coronavirus/2019-ncov/community/reopen-guidance.html>)
- The school has purchased EPA-registered products from List N (disinfectants for use against SARS-CoV-2). The school custodial staff has been trained in best practices for both cleaning and disinfecting. They have also reviewed the latest CDC and CAPHD guidance for cleaning and disinfecting public places. The school custodian will also use a ULV mister/sprayer in the bathrooms, classrooms, picnic tables, and play structures.

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

- Close all areas that the confirmed case was in for a minimum of XXXX fifteen minutes.
- The school custodian will use a ULV mister/sprayer in the areas. The school custodial staff has been trained in best practices for both cleaning and disinfecting with proper equipment. They have also reviewed the latest CDC and CAPHD guidance for cleaning and disinfecting public places.

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 having the employee clean the item before returning it. The school has purchased EPA-registered products from List N (disinfectants for use against SARS-CoV-2), and employees have been trained to disinfect after using any shared item.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Require frequent hand washing, especially at recess and lunch times. Everyone is taught and reminded to wash hands frequently for at least 20 seconds.
- Posted signs at sinks showing proper hand washing methods.
- Installed hand sanitizer on each classroom door. Everyone is required to use hand sanitizer before entering, unless the person has a doctor's note.
- Placed a hand sanitizer station in the picnic area and added dispensers in the staff office and lounges.
- The kindergarten and 1st grade classrooms have sinks, and hand washing is taught and scheduled into everyone's day.
- Grades 2-8 have scheduled restroom breaks for hand washing.

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:

- Isolated from other employees and sent home immediately.
- Offered COVID-19 testing at no cost at any of the state testing sites. Appointments can be made at lhi.care or at RiteAid.
- Provided with information on benefits available. (see <https://handbook.la-archdiocese.org/chapter-8/section-8-12> for current information)

In the event of a confirmed case among staff or students, the office manager and principal are responsible for gathering the necessary data for contact tracing. The school tracks who is on campus and for how long to assist in the potential need for contact tracing. While parents will not be entering the classrooms, guests coming to the office for assistance or to sign in/out a student are checked in through our visitor system. The purpose and duration of their visit is documented in the system, which creates a spreadsheet. Tracing of staff members will be done through online check in and sign out forms, which includes the ability to create a spreadsheet of dates and times each staff member was on campus.

- In accordance with state and local laws and regulations, school administrators notify local health officials (SBCPHD), staff, and families immediately of any case of COVID-19 while maintaining confidentiality in accordance with the Americans with Disabilities Act (ADA) and FERPA and/or other applicable laws and regulations.
- “The school will give the state mandated notice to co-employees who were at the worksite during the infected employee’s infectious period. See section 8-12-2 of the ADLA Administrative Handbook: [Chapter 8-12-2 \(la-archdiocese.org\)](https://handbook.la-archdiocese.org/chapter-8-12-2)”
- The school might need to implement short-term cohort closure procedures if/when an infected person has been on campus during their infectious period and has close contact with others.

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, and how.
 - Employees with COVID-19 symptoms should immediately report to the school principal via phone. All employees have access to the internal phone system on site and have the principal’s cell phone number for contact outside of work hours.
- That employees can report symptoms and hazards without fear of reprisal.
- Where testing is not required, how employees can access COVID-19 local testing center.
 - Employees are surveillance tested every other month in compliance with guidelines from the SBCPHD.
 - Free testing is available at state testing centers by making an appointment at lhi.care.
 - Rite Aid also provides free testing. Employees can schedule an appointment at <https://www.riteaid.com/pharmacy/services/covid-19-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.
- 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 10 days after the last known COVID-19 exposure to a COVID-19 case.
- 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

- Anyone who has been exposed to COVID-19 must quarantine at home for 10 days and continue to monitor his or her health for an additional 4 days. This means that the exposed person must remain at home for the entire quarantine period, even if the exposed person tests negative during the quarantine period. If an exposed person has no symptoms through the 10th day, the exposed person may return to work or ministry.
- An infected person must isolate at home (within one room and bathroom if possible) until such time as the infected person is released by a doctor. All infected employees returning to work must present a licensed health care provider's note fully releasing the employee to return to work, or other appropriate confirmation to the same effect.

This plan has been reviewed and approved by

Michelle Cox

Michelle Cox, Principal
January 28, 2021

Appendix B: COVID-19 Inspections

Date:

Name of person conducting the inspection:

Work location evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Administrative			
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			
PPE (not shared, available and being worn)			
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:			
Employee name: (or non-employee*)		Occupation: (if non-employee, why they were in the workplace)	
Date investigation was initiated:		Location where employee worked: (or non-employee was present in the workplace)	
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 the local health department notified?		Date:	
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*Should an employer be made aware of a non-employee infection source COVID-19 status.

