

Our Lady of the Miraculous Medal Parish School

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/



November 2020

COVID-19 Prevention Program (CPP) for Our Lady of the Miraculous Medal School, Montebello, CA

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

Date: February 17, 2021

Authority and Responsibility

Dominique Preciado, Principal of Our Lady of the Miraculous Medal School 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 all protocols issued by the Department of Health**

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: Requesting they share any concerns and informing them of the option to participate in the formal evaluations and inspections.

Employee screening

We screen our employees by:

- Conducting screenings before employees may enter the workspace. Checks include a check-in concerning a new cough, shortness of breath, difficulty breathing, fever or chills, close contact with anyone at home, school or elsewhere that the individual has been told has tested positive for COVID-19, if the employee is currently under isolation or quarantine orders, or any other symptom, muscle/body aches, vomiting, diarrhea, or new loss of taste or smell. Temperature checks are part of the screening and those who report a fever of 100.4 or higher are not permitted to enter campus.

Correction of COVID-19 Hazards

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

- The severity of the hazard will be assessed and correction time frames assigned, accordingly.
- Identified individuals will be responsible for timely correction.
- Follow-up measures are taken to ensure timely correction.

Control of COVID-19 Hazards

Physical Distancing

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

- 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.

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.
- A medical grade mask is provided to any employee who cares for sick children or who has close contact with any child with a medical condition that precludes the child's use of a cloth face covering.
- The covering must be worn by the employee at all times during the workday when in contact or likely to come into contact with others.
- Employees are instructed to wash or replace their face coverings daily.

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:

- Rearranging desks to ensure social distancing
- Desk partitions for every student

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

- The school HVAC system is in good, working order.
- HVAC systems are set to maximize indoor/outdoor air exchange unless outdoor conditions (recent fire, very high outside temperature, high pollen count, etc.) make this inappropriate.
- Air filters have been upgraded to the highest efficiency possible.
- Doors and windows are kept open during the school day if feasible and if outdoor conditions make this appropriate.

Cleaning and disinfecting

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

- A cleaning and disinfecting schedule has been established in order to avoid both under- and over- use of cleaning products.
- Common areas and frequently touched objects in those areas (tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, elevator switches and buttons, touch screens, printers/copiers, grab bars, and handrails) are disinfected at least daily and more frequently as resources allow using appropriate products.
- Where individualized alternatives are not feasible, objects and surfaces will be cleaned and disinfected between users.
- Restrooms, lobbies, break rooms, and lounges and other common areas will be disinfected frequently, on the following schedule:
 - ✓ Restrooms: Daily and as resources permit
 - ✓ Lobbies/entry areas: Daily and as resources permit
 - ✓ Teacher/staff break rooms: Daily and as resources permit
 - ✓ Classrooms Daily and as resources permit
 - ✓ Cafeteria dining area: Daily and as resources permit
 - ✓ Cafeteria food preparation area: Daily and as resources permit
 - ✓ Front office: Daily and as resources permit
 - ✓ Other offices: Daily and as resources permit

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

- If the school identifies 1 confirmed case (positive test student or employee), the school will request that the case follow Home Isolation Instructions for COVID-19
<http://publichealth.lacounty.gov/acd/docs/HomeisolationenCoV.pdf>
<http://publichealth.lacounty.gov/acd/docs/HomeisolationenCoVSpn.pdf>
- The school will inform the case that the Department of Public Health (LADPH) will contact the case directly to collect additional information and issue the Health Officer Order for Case Isolation.
- The school will notify the Department of Public Health of all confirmed cases of COVID-19 disease among employees and children who had been at the school at any point within 14 days prior to becoming ill and persons at the school who were exposed.
- The school will work with the case to generate a list of students and/or employees with exposure to the case while infectious.

- The school will notify students and employees that are identified to have had an exposure to the case at school through a letter or other communication strategies.
- The school will instruct exposed students and employees to self-quarantine (stay in their home or another residence, separate from others) and monitor for symptoms for 10 days from their last contact with the case while infectious (as defined above), even if they receive a negative test result during their quarantine period. If they remain asymptomatic, they are released from quarantine after Day 10 but must continue to monitor their health and strictly adhere to COVID-19 prevention precautions through Day 14. Note: a person who tests negative may subsequently develop disease, with or without symptoms, if tested during the incubation period (i.e., time period between exposure and disease onset).
<http://publichealth.lacounty.gov/acd/ncorona2019/covidquarantine/>
<http://publichealth.lacounty.gov/acd/docs/COVHomeQuarantineSpn.pdf>
- The school will inform them that the LADPH will contact them directly to collect additional information and issue Health Officer Order for Quarantine:

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:

- A combination of cleaning/sanitizing crew and employees. Training will be provided by the school nurse.

Hand sanitizing: In order to implement effective hand sanitizing procedures, we:

- Evaluate hand washing facilities.
- Installed portable hand washing stations.
- Encouraging and allowing time for employee handwashing.
- Hand sanitizer (Ethyl alcohol-based at least 60% ethanol) is made available to students and staff at strategic locations throughout the school where there is no sink or portable handwashing station (classrooms, offices,). Ethyl alcohol-based hand sanitizer is preferred and should be used in school environments.
- Hand sanitizers with isopropyl alcohol as the main active ingredient are not used in the school, as it is more irritating and can be absorbed through the skin.
- Hand sanitizers containing methanol (methyl alcohol) are prohibited due to the risk of toxic effects when absorbed through the skin, or ingested.
- Encouraging employees 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.

- Staff performing screenings are provided with a medical grade mask and a face shield.

- Staff taking care of a sick student are provided with a medical grade mask to wear themselves, and a medical grade mask for the student to wear (if it can be tolerated) until the student leaves the building. Custodial staff and other staff responsible for cleaning and disinfecting are equipped with appropriate personal protective equipment, including gloves, eye protection, respiratory protection and other appropriate protective equipment as required by the product.

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:

- Provided with testing resources through primary care provider, or county testing sites;
 - lacounty.gov/testing
 - covid19.lacounty.gov
 - Or by calling 211 to schedule a Covid test
- The employer provide within 1 business day the Notice of Potential Exposure to COVID-19: [Microsoft Word - 20201230 COVID19 Notice to Employees \(la-archdiocese.org\)](http://la-archdiocese.org)

AND Benefits Notice:

[COVID-19 benefits Rev 1-15-2021.pdf \(la-archdiocese.org\)](http://la-archdiocese.org)

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:

- Informing employees via training and written communications the name and contact information for the school liaison.
- That they 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 severe COVID-19 illness.
- Where testing is not required, how employees can access COVID-19 testing
 - Refer to testing resources:
 - Primary health care provider
 - Community testing sites (<https://covid19.lacounty.gov/testing/>)
 - LA County Information line 2-1-1 available 24/7
- 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 follow local health department directives and/or continue to refer employees to their primary care provider, community testing sites.

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 and requiring that they continue to check for COVID-19 symptoms through day 14.
- Providing employees at the time of exclusion with information on available benefits.

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- 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
- Providing employees at the time of exclusion with information on available benefits.

Reporting, Recordkeeping, and Access

It is our policy to:

- The school will notify the Department of Public Health of all confirmed cases of COVID-19 disease among employees and children who had been at the school at any point within 14 days prior to becoming ill and persons at the school who were exposed within 1 business day.
- Immediately report 3 or more cases of COVID-19 to the LADPH.
- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide 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.
- We will keep a record 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 10 days from the time the order to quarantine was effective.
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