

# 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

## St. Turibius School

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

**Date: March 15, 2021 [Last Updated]**

### Authority and Responsibility

**Karina Mendez & Audrey Blanchette** have 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 by the CA 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: **reporting any concerns to the administration in a timely manner. The COVID-19 Compliance Team consists of the principal, school secretary, and staff members. The COVID-19 Compliance Team is responsible for establishing and enforcing all**

COVID-19 safety protocols, ensuring the staff and students receive education about COVID-19. Mrs. Mendez & Mrs. Blanchette, the school administrators, serve as the liaisons to the Department of Public Health in the event of an outbreak on campus.

### **Employee screening**

We screen our employees by:

- **Staff members are responsible for screening themselves at home for symptoms of COVID-19.**
- **Anyone with symptoms consistent with COVID-19 should remain at home in isolation for a minimum of 10 days, including at least 72 hours without a fever and improvement of other symptoms.**
- **Staff members with a fever of 100.4°F or above, who show coughing, fatigue or shortness of breath, or who display other COVID-19 symptoms will be asked to leave the premise immediately. If they cannot and need to wait for transportation, there is an isolation room for them to wait.**
- **Staff members must notify school if they or any other household member tests positive for COVID-19. In such a situation, they may not return to school until they are allowed to exit self-isolation or self-quarantine under the County Health Orders.**
- **At school, staff members will be asked the same health questions, as well as given a temperature check. Furthermore, 25% of the staff are tested weekly and as 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:

**Administration will assess all hazards in a timely manner (within 24 hours) and notify all affected staff within the same time frame. Appropriate communication for all affected stakeholders (parents, students, parish) and authorities will be completed. Staff must abide by health and safety guidelines. If they do not abide by social distancing, mask-wearing, and other health and safety guidelines to reduce the spread of COVID-19, disciplinary actions will be taken (i.e. asked to leave the premises).**

### **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:

## **SPECIFIC CHANGES AT THE SCHOOL LEVEL**

- **Physical Distancing Outside the Classroom:**
  - Floor markings are outside the front offices if a person needs to speak with the secretary and/or principal.
  - Teachers and staff will ensure that students are maintaining social distance when outside during recess and inside in the hallway in line.
- **Closed Campus:** NO non-essential people on campus. Use of school facilities for non-school purposes is not permitted.
- **Cohorts:** Students will be kept in classroom cohorts

## **SPECIFIC CHANGES IN THE CLASSROOMS**

- **Social Distancing:**
  - Student desks are at least 6 feet away from teacher desks. Student desks in the classroom are arranged 6ft apart where possible from other students and no less than 3ft.
  - Recess is staggered between grade-level bands. Grades will have assigned play areas.

## **SPECIFIC CHANGES AT DROP-OFF & PICK-UP**

- **Access to School Building:**
  - **Students:** May only enter the school building after proper health checks (social distancing).
  - **Parents:** If parents need to enter to speak to the front office, they must follow social distancing procedures, 6ft markings and proper health checks.
- **Drop Off:**
  - All car drop-off must occur at designated drop off location
  - Students who walk must enter through the designated drop off locations. Students will enter through the office after proper health and temperature checks if they are tardy. Parents may not enter with them. Doors should be locked at all times to ensure that they are buzzed in within social distance intervals.
- **Pick-up:**
  - Students will be picked up through a car line at designated times. Students will safely sit six feet apart waiting to be called upon. Principal/Staff Support will call student names as cars approach. Students will walk to their vehicles. Parents and students will not be permitted to stop, gather, and socialize. Students who are walking leave through designated exit.
- **Early Leave:** When leaving early, parents must call ahead and request dismissal early dismissal. Once parents have arrived, the student will go out the front doors where parents are waiting (office members walking them).

- **Tardies: When arriving late, only students will be allowed to enter through the front doors (after proper health and temperature checks). Parents must remain outside.**

### **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.

**Staff and students will bring their own masks. However, disposable masks are available in the school office and in all of the classrooms.**

**Everyone who enters the school grounds must wear face coverings on campus at all times (this includes the school yard). Masks may only be removed when eating and remaining proper social distancing.**

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.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

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: **Everyone must wear face coverings.**

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

- **All doors and windows will be opened as appropriate given the weather and air quality during the school day to provide proper ventilation and air circulation.**
- **Ceiling fans in the classrooms will be turned on to improve airflow as necessary.**

### **Cleaning and disinfecting**

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

- **Adequate cleaning supplies have been acquired.**
- **Common and frequently used areas will be cleaned daily.**
- **Faculty members have been given disinfectant wipes and cleaning supplies to clean their classroom throughout the day.**
- **The custodial staff will deep clean and disinfect at the end of every day to ensure classrooms, offices, and common areas are sanitized.**

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

**Disinfecting and sanitizing of all areas affected will begin promptly after a confirmed case followed by a 48 hour open-air period.**

### **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 **staff and the custodian.**

**Teachers will continue to implement digital technology and tools to limit paper and material usage. Each student will have their own technology device to limit sharing.**

### **Hand sanitizing**

In order to implement effective hand sanitizing procedures, we:

- **Staff will continue to teach and reinforce washing hands, avoiding contact with one's eyes, nose, and mouth, and covering coughs and sneezes among students and staff. We will teach and reinforce use of cloth face coverings, masks, or face shields, as well as other social distancing protocols throughout the day.**
- **Students and staff will be given frequent opportunities to wash their hands. Frequently scheduled mandatory handwashing breaks or opportunities will be provided.**
- **Approved hand sanitizers can be used as a substitute when hand-washing is not possible. Hand sanitizer will be available in every classroom.**
- **The need for additional hand washing stations will be evaluated upon the return to in-person instruction.**

**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:

- **Directed to a COVID-19 testing site.**
- **The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to them.**

## 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: **Employee should report to the principal(s) about symptoms via phone, email, or text.**
- 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.
- Where testing is not required, how employees can access COVID-19 testing: **Visit [covid19.lacounty.gov/testing](https://covid19.lacounty.gov/testing) or contact their primary healthcare provider.**
- 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 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 employee sick leave benefits (as applicable)**.
- 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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**Karina Mendez, Principal**

**Date: March 15, 2021**

## 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:** Karina Mendez

**Date:** April 1, 2021

**Name(s) of employee and authorized employee representative that participated:** Audrey Blanchette, Vianey Hernandez

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
Coming to campus	Office/Reception Area	Close contact	Distancing, limitation of staff and visitors in area, allowing doors to be open for ventilation
Restrooms	Restrooms	Close contact; exposure	Daily disinfecting with aerosols



## 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 the form accordingly.]

Date: April 1, 2021

Name of person conducting the inspection: Karina Mendez

Work location evaluated: St. Turibius School

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Barriers/partitions	N/A		
Ventilation (amount of fresh air and filtration maximized)	Assessed and monitored	Karina Mendez	
Additional room air filtration			
<b>Administrative</b>			
Physical distancing	Ongoing	Karina Mendez (classrooms) Vianey Hernandez (Office)	
Surface cleaning and disinfection (frequently enough and adequate supplies)	Ongoing	Teachers & Staff, Jorge Salazar	
Hand washing facilities (adequate numbers and supplies)		Jorge Salazar	

Disinfecting and hand sanitizing solutions being used according to manufacturer instructions	Ongoing	Teachers & Staff, Jorge Salazar	
<b>PPE</b> (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)	Ongoing	Teachers and Staff, Karina Mendez	
Gloves	Ongoing	Karina Mendez, Audrey Blanchette	
Face shields/goggles	Ongoing	Karina Mendez, Audrey Blanchette	
Respiratory protection	N/A		

## Appendix D: COVID-19 Training Roster

Date: **March 26, 2021 (remotely) - Updates provided at faculty meetings as necessary**

Person that conducted the training: **Karina Mendez**

Employee Name	Signature
Karina Mendez	
Audrey Blanchette	
Vianey Hernandez	
Jorge Salazar	
Blanca Moreno	
Selene Ruiz	
Xiomara Diaz	
Kelly Nunez	
Esther Richardson	

Jazlyn Nunez	
Luis Gonzales	
Jaci Glorioso	
Anthony Perea	
Mary Stoutenburgh	