

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/



November 2020

COVID-19 Prevention Program (CPP) for **Saint Joseph School.**

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

Date: January 20, 2021 [Last Updated]

Authority and Responsibility

Kevin Donohue 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 raising any concerns with administration.**

Employee screening

We screen our employees by: **self-screening prior to arrival at work, temperature administration using thermal thermometers when signing-in, and the implementation of remote sign-in/screen-in through Visitu visitor software.**

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 directly affected staff within the same time frame. Appropriate communications for all affected stakeholders (parents, students, parish) 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 concert 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, if their position allows so.**
- **The office may have only 2 visitors at a time with distancing reminders in place and seating removed. Visitors on campus are not permitted.**
- **Floor markings are placed in the office and vestibule areas with reminders at all entrances to campus.**
- **Plastic barriers installed as allowed and desks within classrooms spaced out.**

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 available in Room One and the 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 partitions 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:

[describe how this will be accomplished, taking into consideration:

- **Filters have been checked and updated as of August 2020**
- **Windows and doors left open as appropriate given weather and air quality.**
- **The purchase and monitoring of air quality equipment to measure the levels of carbon dioxide, particulate matter, humidity, and dust.**

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 Room One and the office.**

Should we have a COVID-19 case in our workplace, we will implement the following procedures: **administered wipedown of all affected surfaces with disinfectants provided by Hillyard 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 **wiping down using Hillyard-provided supplies.**

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

[describe your site-specific procedures, including:

- **Additional handwashing facilities acquired through CARES Act funding in partnership with Hawthorne School District.**
- **Handwashing stations provisioned for outdoor play area and each classroom area.**
- **Staff encouraged to hand wash with students at all “break” times (recess/lunch/transition).**
- **Hand sanitizers purchased and installed in all classroom 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:

[indicate how the following will be accomplished:

- **COVID-19 testing will be conducted monthly on-campus. Staff testing off-campus will be compensated for their time. COVID-19 testing at no cost during their working hours.**
- **All information on benefits has been communicated via Human Resources with the principal reviewing it during faculty meetings and on-demand.**

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: Kevin Donohue should be informed immediately in-person or via phone.
- 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.
- Where testing is not required, how employees can access COVID-19 testing. **N/A**
- 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.

- **Additional signage around testing and safety precautions has been placed in the employee sign-in area and entrances to campus.**

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 **sick leave (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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Principal, January 20, 2020 [Last Updated]

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: **Kevin Donohue**

Date: **July and August 2020**

Name(s) of employee and authorized employee representative that participated: **Cathy Urbigkeit, Keila Gutierrez**

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 Area (c 8am and 3pm)	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

Date: **January 20, 2021**

Name of person conducting the inspection: Kevin Donohue, Ruben Gutierrez

Work location evaluated: **Saint Joseph School**

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions	Installed	Kevin Donohue	January 15
Ventilation (amount of fresh air and filtration maximized)	Assessed via monitor	Kevin Donohue	January 15
Additional room air filtration			
Administrative			
Physical distancing	On-going	Kevin Donohue (classrooms) Keila Gutierrez (office)	
Surface cleaning and disinfection (frequently enough and adequate supplies)	On-going	Ruben Gutierrez	
Hand washing facilities (adequate numbers and supplies)	Installed	Kevin Donohue	January 19
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions	On-going	Staff Supervisors for Classrooms	
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)	On-going	Staff Supervisors for Classrooms	
Gloves	On-going	Keila Gutierrez	
Face shields/goggles	On-going	Kevin Donohue	
Respiratory protection	N/A		

Appendix D: COVID-19 Training Roster

Date: **August 10, 2021 (remotely) [Updates provided at faculty meetings as necessary]**

Person that conducted the training: **Kevin Donohue**

Employee Name	Signature
Cathy Urbigkeit	
Keila Gutierrez	
Steven Abonal	
Robert Santos	
Stacey Abney	
Melissa Talledo	
Erika Haro	
Victoria King	
Cynthia Naranjo	
Susan Cook	
Amanda Nilsson	
Sadie Sandoval	
Victoria Garcia	

