

St. Columbille

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 the Emergency Temporary Standards 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. Instead, they 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). Cal/OSHA encourages employers to engage with employees in the design, implementation and evolution of their CPP.

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
 - The four Additional Considerations provided at the end of this program to see if they are applicable to your workplace.
- Additional guidance and resources are available at www.dir.ca.gov/dosh/coronavirus/



June 2021

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COVID-19 Prevention Program (CPP) for St. Columbkille School

This CPP is designed to control employees' exposures to the SARS-CoV-2 virus (COVID-19) that may occur in our workplace.

Date: Thursday, August 19, 2021

Authority and Responsibility

St. Columbkille 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 implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Document the vaccination status of our employees by using **Appendix E: Documentation of Employee COVID-19 Vaccination Status**, which is maintained as a confidential medical record.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Develop COVID-19 policies and procedures to respond effectively and immediately to individuals at the workplace who are a COVID-19 case to prevent or reduce the risk of transmission in the workplace **In line with the exposure management plan, St. Columbkille has a designated space for the isolation of case(s) following identification of persons exposed to cases at school. Exposed unvaccinated employees and/or students will be instructed to stay home and quarantine. All individuals are assured of access to testing within the school, regardless of vaccination status, as the basis for further control measures. DPH will be notified of all confirmed cases of COVID-19 disease among employees and children who had been at school at any point within 14 days prior to the illness onset date.**
- 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

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as needed to identify and evaluate 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: all staff report directly to school and church offices using existing hardcopy memos

- **all staff may email directly to administrators: __Jacqueline Reyes**
_jreyes@columbkille.org_____
- **school staff install and update signs**
- **custodian, principal and Office Manager, conduct walkthroughs to identify needs**
- **all staff report their needs for PPE and cleaning materials to**
- **custodial staff who carry out the sanitizing and disinfecting report directly to the principal**

Employee screening

We screen our employees and respond to those with COVID-19 symptoms by:

1. **Daily Temperature Screening**
2. **Facial Covering Requirements:**

All staff must wear face coverings at all times while on site, unless working in an office or classroom alone. Coverings must:

- **be fitted properly over the nose and mouth**
- **be made of safe material to breathe through**
- **May be worn with a lanyard to ensure the covering is available to the individual at all times**
- **meet PPE standards**

3. **General Requirements**

- **Throughout the day if a staff member presents with symptoms, they are required to leave immediately**
- **All staff must maintain at least 6 feet distance from each other at all times**
- **All staff must wash hands throughout the day and have access to sinks, soap and hand towels, as well as hand sanitizers, those for personal use and are available in classrooms and in hallways throughout campus**
- **Staff temperature may be rechecked and the person re-screened at any time during the day, using a thermometer if there is any cause for concern. Thermometers are available at the school office.**
- **When indoors, all staff must ensure that face coverings are used during screening**

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures are documented on the **Appendix B: COVID-19 Inspections** form, and corrected in a timely manner based

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on the severity of the hazards, as follows:

The severity of the hazard will be assessed and correction time frames assigned, accordingly. Individuals from maintenance crew and staff are identified as being responsible for timely correction. Follow-up measures are taken to ensure timely correction, such as walkthroughs and a record of the correction is kept on file as necessary by the director of maintenance.

Control of COVID-19 Hazards

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.

All staff were issued with a supply of face masks and face shields, gloves, sanitizer wipes, and hand sanitizer. These will be replaced as needed on application at the school office. If an employee encounters an individual (non-employee) without a mask, they are to withdraw immediately to a safe location, and report the encounter to the school office. If the individual is a school family member, or is known to the school, the office will then follow up with the individual to ensure they are aware of the policy to wear masks at all times.

Employees required to wear face coverings in our workplace may remove them under the following conditions:

- When an employee is alone in a room or a vehicle.
- While eating or 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 feasible.
- Employees are required to wear respirators in accordance with our respirator program that meets section 5144 requirements.
- 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. Such employees will wear an effective, non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition permits it.
- Specific tasks that cannot feasibly be performed with a face covering. This exception is limited to the time in which such tasks are being performed.

Any employee not wearing a required face covering or allowed non-restrictive alternative, will be at least six feet apart from all other persons unless the unmasked employee is either fully vaccinated or tested at least weekly for COVID-19.

We will not prevent any employee from wearing a face covering when it is not required unless it would create a safety hazard, such as interfering with the safe operation of equipment.

Face coverings will also be provided to any employee that requests one, regardless of their vaccination status.

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Engineering controls

For indoor locations, using Appendix B, we identify and evaluate how to maximize, to the extent feasible, ventilation with outdoor air using the highest filtration efficiency compatible with our existing ventilation system, and whether the use of portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems, would reduce the

- **Classroom doors and windows may be opened as needed to facilitate ventilation.**
- **The school buildings are owned and operated by the parish of St. Columbkille and Archdiocese of Los Angeles. The ventilation system is monitored by the custodian, who is responsible for checking and replacing all filters, and for employing appropriate contractors when more specialist repairs and maintenance are needed.**
- **All filters are changed to the recommended EPA standards**
- **Air purifiers are provided for each classroom**
- **All classrooms have air conditioners.**

Cleaning and disinfecting

We implement the following cleaning and disinfection measures for frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, phones, headsets, bathroom surfaces, and steering wheels:

St. Columbkille School has one full-time custodial staff members, with an evening maintenance cleaning company. St. Columbkille School uses disinfecting products approved for use against COVID-19 (EPA list). School (class based and office) staff assist with cleaning personal and commonly used surfaces.

We implement thorough cleaning and disinfection measures for frequently touched surfaces. Commonly touched surfaces, such as doorknobs and railings, are disinfected frequently throughout the day. All working surfaces and shared objects are sanitized after each use. In addition, maintenance and custodial staff do a thorough cleaning of every classroom daily. All cleaning supplies used are in compliance with the lists of approved disinfectants.

Each staff member is responsible for the following:

- **Cleaning of classrooms, offices, and common-use areas at the end of each use and at the conclusion of the day. Disinfection is done when students are not present.**
- **Cleaning handles and doorknobs and light switches 3X per day. School staff will assist during the school day.**
- **Copy machines, printers, electronic devices at the conclusion of the day. After each use, the user will clean the devices as well.**
- **Student and adult restrooms are cleaned twice per day.**
- **Faucets/sinks cleaned twice per day.**
- **All classrooms and common areas are sprayed with disinfectant at the end of the**

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day, after everyone has left.

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

- **Using EPA approved disinfectant products, we will arrange for cleaning and disinfection of the classroom and primary spaces where the case spent significant time.**
- **Disinfection is done when students are not present.**
- **Properly trained custodial staff will be equipped with proper PPE, including gloves, eye protection, and other appropriate protective equipment.**
- **The classrooms and common areas will be disinfected and will be aired out overnight (12 hours) before students and staff are allowed to return.**

If it is determined that a person with COVID-19 has been at school and poses a risk of exposure, the school may consider closing for further cleaning, disinfecting and quarantine.

Hand sanitizing

To implement effective hand sanitizing procedures, St. Columbkille has the following in place:

- **Hand sanitizer is available for use throughout campus in all hallways, classrooms, offices, and the staff workroom.**
- **Three new handwashing stations have been installed outside. These stations have soap and paper towels, as well as designated trash containers.**
- **All employees have been provided with personal bottles of hand sanitizer, which will be replaced as needed.**
- **Employees are encouraged and allowed to use handwashing facilities throughout the day in restrooms. Signage indicates that they wash hands for at least 20 seconds each time.**
- **Staff and students are expected to wash/sanitize their hands:**
 - **before and after eating**
 - **after using the restroom**
 - **after outdoor play**
 - **before and after any group activity**

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 section 3380, and provide and ensure use of such PPE as needed.

Upon request, we provide respirators for voluntary use to all employees who are not fully vaccinated and who are working indoors or in vehicles with more than one person

We also provide and ensure use of eye and respiratory protection when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

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Testing of symptomatic employees

We make COVID-19 testing available at no cost to employees with COVID-19 symptoms who are not fully vaccinated, during employees' paid time.

Investigating and Responding to COVID-19 Cases

We have developed effective procedures to investigate COVID-19 cases that include seeking information from our employees regarding COVID-19 cases, close contacts, test results, and onset of symptoms. This is accomplished by using the **Appendix C: Investigating COVID-19 Cases** form.

We also ensure the following is implemented:

- **Employees that had a close contact are offered COVID-19 testing at no cost during their working hours.**
 - **Employees who were fully vaccinated before the close contact and do not have symptoms.**
 - **COVID-19 cases who were allowed to return to work per our return-to-work criteria and have remained free of symptoms for 14 days or after the first positive test.**
- **The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to employees.**
- **Written notice within 1 day of your knowledge of a COVID-19 case that people at the worksite may have been exposed to COVID-19. This notice will be provided to all employees (and their authorized representative), independent contractors and other employers at the worksite during the high-risk exposure period. These notifications must meet the requirements of T8CCR section 3205(c)(3)(B) and Labor Code section 6409.6(a)(4); (a)(2); and (c), and in a form readily understandable by employees and can be anticipated to be received by the employee.]**

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:
Jacqueline Reyes and Erika Espinoza
- All employees can report symptoms and hazards without fear of reprisal.
- Employees with medical or other conditions that put them at increased risk of severe COVID-19 illness can request accommodations, **by submitting a request in writing to St. Columbille with appropriate supporting documentation from a licensed physician .**
- **Employees will have access to COVID-19 testing when testing is required. This is provided at no cost to the employee during working hours, including when**

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the testing is in response to CCR Title 8 section 3205.1, Multiple COVID-19 Infections and COVID-19 Outbreaks, as well as section 3205.2, Major COVID-19 Outbreaks.

- **Information about COVID-19 hazards that 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, are as follows:**
 - **Employees who are identified during work hours as a “COVID-19 hazard” are sent home immediately to isolate and quarantine, and/or seek medical help as needed**
 - **Employees who may have been exposed to a COVID 19 hazard at work will be informed by email immediately. This email will explain what is being done to control the hazard, our COVID-19 policies and procedures. The identity of the individual is to be held confidentially.**
 - **An email (and/or a text, and/or voice mail) with appropriate link and instructions to access the email, will be sent to the school families and all employees to communicate the circumstances of any exposures with instructions as appropriate for isolating, quarantining and testing.**

Training and Instruction

We provide effective employee training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards, and how to participate in the identification and evaluation of COVID-19 hazards.
- Information regarding COVID-19-related benefits (including mandated sick and vaccination leave) 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.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing, face coverings, increased ventilation indoors, and respiratory protection decrease the spread of COVID-19 and are most effective when used in combination.
- The right of employees that are not fully vaccinated to request a respirator for voluntary use, without fear of retaliation, and our policies for providing the respirators. Employees voluntarily using respirators will be trained according to section 5144(c)(2) requirements:
 - How to properly wear them.
 - How to perform a seal check according to the manufacturer’s instructions each time a respirator is worn, and the fact that facial hair can interfere with a seal.
- 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.

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- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment. Since COVID-19 is an airborne disease, N95s and more protective respirators protect the users from airborne disease, while face coverings primarily protect people around the user.
 - The conditions where face coverings must be worn at the workplace.
 - That face coverings are additionally recommended outdoors for people who are not fully vaccinated if six feet of distance cannot be maintained.
 - Employees can request face coverings and can wear them at work regardless of vaccination status and without fear of retaliation.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- Information on our COVID-19 policies and how to access COVID-19 testing and vaccination, and the fact that vaccination is effective at preventing COVID-19, protecting against both transmission and serious illness or death.

Appendix D: COVID-19 Training Roster will be used to document this training.

Exclusion of COVID-19 Cases and Employees who had a Close Contact

Where we have a COVID-19 case or close contact in our workplace, we limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees that had a close contact from the workplace until our return-to-work criteria have been met, with the following exceptions:
 - Employees who were fully vaccinated before the close contact and who do not develop COVID-19 symptoms.
 - COVID-19 cases who returned to work per our return-to-work criteria and have remained free of COVID-19 symptoms, for 90 days after the initial onset of COVID-19 symptoms, or for COVID-19 cases who never developed COVID-19 symptoms, for 90 days after the first positive test.
- Continuing, and maintaining employees' earnings, wages, seniority, and all other employees' rights and benefits for employees excluded from work. This will be accomplished by **employer-provided employee sick leave benefits, payments from public sources or other means of maintaining earnings, rights and benefits, where permitted by law and when not covered by workers' compensation.** Reference section 3205(c)(9)(C) for exceptions].
- Providing employees at the time of exclusion with information on available benefits.
<https://handbook.la-archdiocese.org/chapter-8/section-8-12/topic-8-12-2>

Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases and outbreaks at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with section 3203(b).

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- 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.

Return-to-Work Criteria

- **COVID-19 cases with symptoms** will not return to work until all the following have occurred:
 - At least 24 hours have passed since a fever of 100.4 °F. or higher has resolved without the use of fever-reducing medications, and
 - COVID-19 symptoms have improved, and
 - At least 10 days have passed since COVID-19 symptoms first appeared.
- **COVID-19 cases who tested positive but never developed 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 once the requirements for “cases with symptoms” or “cases who tested positive but never developed symptoms” (above) have been met.
- Persons who had a close contact may return to work as follows:
 - Close contact but never developed symptoms: when 10 days have passed since the last known close contact.
 - Close contact with symptoms: when the “cases with symptoms” criteria (above) have been met, unless the following are true:
 - The person tested negative for COVID-19 using a polymerase chain reaction (PCR) COVID-19 test with specimen taken after the onset of symptoms; and
 - At least 10 days have passed since the last known close contact, and
 - The person has been symptom-free for at least 24 hours, without using fever-reducing medications.
- If an order to isolate, quarantine, or exclude 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.

Principal *Jacqueline Reyes*

Date 8/19/21