

## 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/](http://www.dir.ca.gov/dosh/coronavirus/)



June 2021

# COVID-19 Prevention Program (CPP) for Nativity Catholic School, El Monte, CA 91731

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

**Date: September 1, 2021**

## Authority and Responsibility

**Sister Stacy Reineman** 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, Nativity has a designated space in the office for the isolation of case(s) following identification of persons exposed to cases at school. Exposed students and unvaccinated employees, will be instructed to stay home and quarantine. Vaccinated employees who are asymptomatic do not have to quarantine, but must self monitor for symptoms for 14 days following exposure. 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. All test results will be reported to the Department of Public Health.
- 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 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 director of maintenance or to administrators
- director of maintenance or principal conduct walkthroughs to identify needs
- all staff report their needs for PPE and cleaning materials to school office

## Employee screening

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

### 1. Online Daily Screening Requirements

All school staff must self screen before arrival:

- Have you taken medication to reduce fever in the last 24 hours?
- Do you have respiratory symptoms (cough, shortness of breath, sore throat, congestion)?
- Do you have other symptoms, (fatigue, muscle aches, nausea, diarrhea)?
- Have you had contact with anyone with confirmed or suspected COVID-19 in the last 14 days
- Have you been diagnosed with COVID 19 in the last 14 days?

### 2. Facial Covering Requirements:

All staff must wear face coverings at all times while indoors, 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 wash hands throughout the day and have access to sinks, soap, hand towels, and hand sanitizers

## 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 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 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.

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.
- 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.

### **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:

- All classrooms are equipped with ceiling fans
- Air conditioners in all rooms are also equipped with a fan option to help circulate the air even when the air is not being used.
- Classroom doors and windows may be opened as needed to facilitate ventilation.
- The school buildings are owned and operated by the parish of Nativity and Archdiocese of Los Angeles. The ventilation system is monitored by the director of maintenance, who is responsible for checking and replacing all filters, and for employing appropriate contractors when more specialist repairs and maintenance are needed.
- All HVAC filters are changed every 6 months, and were upgraded in September 2021 to the recommended EPA standards: MERV 13.

### **Cleaning and disinfecting**

We implement the following cleaning and disinfection measures for frequently touched surfaces and objects, such as doorknobs, equipment, tools, headsets, and bathroom surfaces:

Nativity has full-time custodial staff. Nativity 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, are disinfected frequently throughout the day. All working surfaces and shared objects are sanitized regularly. All cleaning supplies used are in compliance with the lists of approved disinfectants.

The maintenance staff member and teachers are 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 periodically throughout the day
- Student and adult restrooms
- Faucets/sinks cleaned daily
- Disinfectant light used in each room nightly

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, Nativity has the following in place:

- Hand sanitizer is available for use throughout campus in classrooms, offices, and the staff workroom.
- 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, available in restrooms and workrooms.
- Staff and students are expected to wash/sanitize their hands:
  - before and after eating
  - after using the restroom
  - after outdoor play

### **Personal protective equipment (PPE) used to control employees' exposure to COVID-19**

We evaluate the need for PPE (such as gloves and face shields) as required by section 3380, and provide and ensure use of such PPE as needed.

Upon request, we provide N95 respirators for voluntary use to all employees who are not fully vaccinated and who are working indoors with more than one person.

## 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.

## 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:
  - **SCHOOL STAFF:** Sister Stacy - [principal@nativity-convent.com](mailto:principal@nativity-convent.com)
- 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 Sister Stacy Reineman with appropriate supporting documentation from a licensed physician .
- 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 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.
- 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 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. 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, rights and benefits, where permitted by law and when not covered by workers' compensation.

## **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).
- 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.



## Appendix B: COVID-19 Inspections

Before starting the inspection, 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.

Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

Name(s) of person(s) conducting the inspection: \_\_\_\_\_

Work location evaluated: Our Lady of the Assumption, Claremont

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Ventilation* (amount of fresh air and filtration maximized)			
Additional room air filtration*			
<b>Additional controls OLA workplace is using (list here)</b>			
<b>Administrative</b>			
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			
<b>Additional controls OLA workplace is using (list here)</b>			

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Additional controls OLA workplace is using (list here)]</b>			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
<b>Additional controls OLA workplace is using (list here)</b>			

\*Identify and evaluate how to maximize ventilation with outdoor air; the highest level of filtration efficiency compatible with the existing ventilation system; and whether the use of portable or mounted HEPA filtration units, or other air cleaning systems, would reduce the risk of COVID-19 transmission. Review applicable orders and guidance from the State of California and local health departments related to COVID-19 hazards and prevention have been reviewed, including the CDPH Interim Guidance for Ventilation, Filtrations, and Air Quality in Indoor Environments and information specific to your industry, location, and operations. We maximize the quantity of outside air provided to the extent feasible, except when the United States Environmental Protection Agency (EPA) Air Quality Index is greater than 100 for any pollutant or if opening windows or maximizing outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.

## Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or persons with COVID-19 symptoms, and any employee required medical records will be kept confidential unless disclosure is required or permitted by law. Un-redacted information on COVID-19 cases will be provided to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH) immediately upon request, and when required by law.

**Date:** [enter date COVID-19 case – suspected/confirmed - became known to the employer]

**Name of person conducting the investigation:** [enter name]

**Name of COVID-19 case (employee or non-employee\*) and contact information:** [enter information]

**Occupation (if non-employee\*, why they were in the workplace):** [enter information]

\*If we are made aware of a non-employee COVID-19 case in our workplace

**Names of employees/representatives involved in the investigation:** [enter information]

**Date investigation was initiated:** [enter information]

**Locations where the COVID-19 case was present in the workplace during the high-risk exposure period, and activities being performed:** [enter information]

**Date and time the COVID-19 case was last present and excluded from the workplace:** [enter information]

**Date of the positive or negative test and/or diagnosis:** [enter information]

**Date the case first had one or more COVID-19 symptoms, if any:** [enter information]

**Information received regarding COVID-19 test results and onset of symptoms (attach documentation):** [enter information]

**Summary determination of who may have had a close contact with the COVID-19 case during the high-risk exposure period. Attach additional information, including:**

- The names of those found to be in close contact.
- Their vaccination status.
- When testing was offered, including the results and the names of those that were exempt from testing because.
  - They were fully vaccinated before the close contact and do not have symptoms.
  - They returned to work per our return-to-work criteria and have remained symptom free for 90 days or, for those that never developed symptoms, for 90 days after the initial positive test.
- The names of those that were excluded per our Exclusion of COVID-19 Cases and Employees who had a Close Contact requirements.
- The names of those exempt from exclusion requirements because:
  - They were fully vaccinated before the close contact and did not develop COVID-19 symptoms.
  - They returned to work per our return-to-work criteria and have remained symptom free for 90 days or, for those that never developed symptoms, for 90 days after the initial positive test.

[enter 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:

1. All employees who were in close contact
2. Their authorized representatives (If applicable, the notice required by Labor Code section 6409.6(a) (2) and (c))

Names of employees that were notified:	Names of their authorized representatives:	Date

Independent contractors and other employers present at the workplace during the high-risk exposure period.

Names of individuals that were notified:	Date

**What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?**  
**[enter information]**

**What could be done to reduce exposure to COVID-19?**  
**[enter information]**

**Was local health department notified? Date?**  
**[enter information]**

## Appendix D: COVID-19 Training Roster

Date: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

Person(s) that conducted the training:

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Employee Name	Signature



