

COVID-19 Prevention Program (CPP) for Christian Brothers High School

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

Date: December 1, 2020

Authority and Responsibility

Dr. Crystal LeRoy, President/CEO 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 and school community.
- 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.
- Conduct Safety Committee meetings monthly, or more frequently if necessary, to continuously assess COVID-19 policies, processes and potential hazards.

Employee participation

Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by: Notifying their supervisor or Human Resources of questions, concerns or potential COVID-19 hazards. Employees may also submit concerns via a support ticket, or anonymously using the Anonymous Alert app.

Employee screening

We screen our employees by:

- Requiring all employees self-screen with the Safely app, according to CDPH guidelines prior to coming to the workplace or campus each day.
- Ensuring that face coverings are used on campus whenever in a public space or within six feet on another individual.

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented on the **Appendix B:**

COVID-19 Inspections form, and corrected in a timely manner based on the severity of the hazards, as follows:

The severity of the hazard will be assessed by the Maintenance Supervisor. If the Maintenance Department is unable to resolve the matter immediately, a correction time frame will be assigned, and communicated accordingly.

Individuals are identified as being responsible for timely correction.

Follow-up measures are taken to ensure timely correction.

Control of COVID-19 Hazards

Physical Distancing

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

- Staggering start times or shift schedules to reduce the number of persons in an area at one time.
- Closing the school campus to non-essential visitors.
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Staggered arrival, departure, work, and break times.
- Adjusted work processes or procedures, such as storing files in separate spaces so as not to have employees unnecessarily sharing spaces.
- Removing tables from break rooms to prevent gathering when physical distancing is not feasible

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 Sacramento County Public Health department (SCPH).

Employees are permitted to wear their own face coverings, as long as they are in accordance with CDC guidelines. However, the school has a supply of face coverings available to employees, which they can obtain in the front office, or by submitting a support ticket.

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.

Engineering controls

We implement the following measures for situations where we cannot maintain at least six feet between individuals:

- Providing plexiglass partitions for all office support staff who greet essential visitors to campus.
- Rerouting traffic patterns to ensure employees are able to travel in one direction with six feet

between themselves and others at all times.

- Disabling access to sinks and restroom stalls that would hinder employees' ability to remain six feet apart.
- When possible, all meetings will be held in a virtual format.

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

- Updating all HVAC intake vents to use high-efficiency MERV 13 filters. Filters are changed every quarter.
- Monitoring the HVAC system daily to ensure that air is circulating at all times.
- When at all possible, employees are encouraged to open doors and windows to allow for natural ventilation.

Cleaning and disinfecting

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

- Cleaning frequently touched surfaces in common use areas, such as doorknobs and handles, at scheduled intervals throughout the day.
- Providing sanitation supplies, such as hand sanitizer, disinfectant wipes and gloves, in break rooms, copy rooms and in all classrooms and common areas, to be utilized after each use of the space.
- All doorknobs, floors, desks and chairs will be cleaned on a nightly basis.

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

If an employee exhibits symptoms consistent with COVID-19 prior to reporting to work, they will be instructed to stay at home and consult their healthcare provider upon completing the self-screening on the Safely Back to School app. Testing for COVID-19 will be suggested. Employees are able to return to the workplace ten days after the employee was last at work when infectious.

If an employee exhibits symptoms consistent with COVID-19 while at work, if the employee is able to drive themselves, that individual will be excused to go home and encouraged to consult their healthcare provider. Employees are expected to remain in self-isolation or quarantine for ten days after 24 hours have passed without fever and symptoms have started improving.

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 each employee after use. Employees are provided gloves, paper towels and sanitizing wipes.

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Installed hand-sanitizing stations across the campus.
- Continuously monitor the need for additional facilities.
- Encourage employee handwashing through signage posted in restrooms, breakrooms and around the campus.
- Encourage employees to wash their hands for at least 20 seconds each time.

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

We evaluate the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8,

section 3380, and provide such PPE as needed.

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:

- Offered COVID-19 testing at no cost through the Sacramento County Public Health testing sites.
- 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 Human Resources automatically receives notification when an employee fails the symptom screening through the Safely Back to School app.
- 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 at the free testing centers offered to educators through the Sacramento County Public Health Department in an effort to give employees the tools to get tested when they have symptoms to reduce the likelihood of bringing the virus to work.
- 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. If employers are required to provide testing because of an employee exposure, employees are able to test at local SCPH testing sites at no cost to the employee during working hours, including when 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 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.
- A designated webpage on the Employee Portal that provides current COVID-19 information and resources.

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.
- Daily reminder to stay home when sick or experiencing symptoms through use of the Safely app health screening tool.
- Posted signage in hallways and common spaces reminding employees to socially distance, wear a face covering and wash their hands.

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

Exclusion of COVID-19 Cases

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 10 days after the last known COVID-19 exposure to a COVID-19 case.
- Continuing and maintaining an employee's earnings and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished through the use of employer-provided employee sick leave benefits, federal and state leave entitlements, and all other rights and benefits for eligible employees, where permitted by law and when not covered by workers' compensation.
- 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, 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, 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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Myra Makelim, Director of Human Resources

12/1/20
Date

Appendix B: COVID-19 Inspections

Date: _____

Name of person conducting the inspection: _____

Work location evaluated: _____

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
One-way traffic through main thoroughfares			
Administrative			
Physical distancing			
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			
Classroom desks 6 feet apart in all directions			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields			
Desk partitions			

Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 testing or related medical services provided by us will be provided in a manner that ensures the confidentiality of employees, with the exception of unredacted information on COVID-19 cases that will be provided immediately upon request to the Sacramento County Public Health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law.

All employees' medical records will also be kept confidential and not disclosed or reported without the employee's express written consent to any person within or outside the workplace, with the following exceptions: (1) Unredacted medical records provided to the local health department, CDPH, Cal/OSHA, NIOSH, or as otherwise required by law immediately upon request; and (2) Records that do not contain individually identifiable medical information or from which individually identifiable medical information has been removed.

Date: _____

Name of person conducting the investigation: _____

COVID-19 Case Investigation Information

Employee (or non-employee*) name:		Occupation (if non-employee, why they were in the workplace):	
Location where employee worked (or non-employee was present in the workplace):		Date investigation was initiated:	
Was COVID-19 test offered?		Name(s) of staff involved in the investigation:	
Date and time the COVID-19 case was last present in the workplace:		Date of the positive or negative test and/or diagnosis:	
Date the case first had one or more COVID-19 symptoms:		Information received regarding COVID-19 test results and onset of symptoms (attach documentation):	

Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional 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:			
All employees who may have had COVID-19 exposure.	Date:		
	Names of employees that were notified:		
Independent contractors and other employers present at the workplace during the high-risk exposure period.	Date:		
	Names of individuals that were notified:		
What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?		What could be done to reduce exposure to COVID-19?	
Was local health department notified?		Date:	

*Should an employer be made aware of a non-employee infection source COVID-19 status.

Appendix D: COVID-19 Training Roster

Date: _____

Person that conducted the training: _____

Employee Name	Signature