

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 St. Rose Catholic School, Santa Rosa, California

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

Date: August 1, 2021

Authority and Responsibility

The school principal, Kathleen Aymar 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.
- Utilize faculty/staff meetings to evaluate and upgrade layers of COVID-19 safety.

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by speaking with their direct supervisor or if not comfortable doing so, with their pastor, principal, Director of Human Resources or Superintendent of Schools.

Employee screening

St. Rose employees are screened daily in this manner:

1. All employees are asked to complete a comprehensive daily Covid-19 self-screening each morning prior to coming on campus, according to CDPH guidelines.
2. Posted signage in employee only areas reminding everyone of Covid-19 hazards, self-assessment of symptoms, and mandatory mask wearing when indoors..
3. If taking temperature of employee were necessary, we will use an infra-red camera located in the school office. The audible message is monitored by the office manager. A normal temperature reading is considered anything less than 100.4 degrees
4. Employees put on face mask as they leave their vehicle. No employee may enter the building without a face mask.

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:

All school employees share responsibility in ensuring a safe environment for themselves, their co-workers and the students of St. Rose. The Covid-19 safety protocols have been explained to every employee. Employees have also been provided an electronic version of the safety plan. All employees shall report hazards to the Principal Kathleen Aymar, Vice-Principal Elisabeth Bertero or office manager, KC Paul the same day the hazard was observed. Serious hazards can be reported immediately by speaking to, calling, or texting the three individuals listed above.

Reported hazards will be investigated the same day and corrected by the next school day or as soon as possible.

Control of COVID-19 Hazards

Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees if not fully vaccinated when they are indoors or in vehicles, and where required by orders from the California Department of Public Health (CDPH). All St. Rose employees are required to wear face masks.

Employees provide their own face coverings and St. Rose also provides clean, undamaged face coverings for anyone who needs one. Face masks are properly worn by employees over the nose and mouth when indoors.

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, 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 twice weekly for COVID-19.

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 are needed, and if they would reduce the risk of transmission.

The school has an ERV HVAC system. When students return to classrooms the system will be set to high speed. We have an onsite maintenance supervisor who can adjust the ventilation system whenever needed. The outside classroom doors and windows will also be used to bring in fresh air, weather permitting.

In the event of poor air quality due to heavy smoke from wild fire, the ventilation system will be adjusted so as not to bring in air from the outside. Depending upon the severity of smoke and the expected duration, students may be asked to resume distance learning.

Cleaning and disinfecting

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

The entire campus is cleaned every evening by a professional cleaning staff who has been trained in COVID precautions.

All employee work areas are equipped with approved cleaning supplies and employees are expected to keep their own work areas cleaned and disinfected. Shared spaces and equipment such as restrooms, refrigerators, and copy machines also have cleaning supplies and signage with instructions for disinfecting.

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

In the event that a person is present on campus during their infectious period, they will be sent home immediately and any areas the person occupied while infectious will be placed off limits until a deep cleaning by our professional cleaning service has been completed.

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:

All employee work areas are equipped with approved cleaning supplies and employees are expected to keep their own work areas cleaned and disinfected. Employees work primarily in their own spaces so telephone, desks, and keyboards are rarely shared. However, employees have been instructed to clean and surfaces in the event that they are shared with another person. Shared spaces and equipment such as restrooms, refrigerators, and copy machines also have cleaning supplies readily available and signage with instructions for disinfecting.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

All employee restrooms are equipped with soap, paper towels, and warm water. Most employees work in classrooms that are also equipped with sinks, soap, and paper towels. Hand sanitizer dispensers are mounted on walls in every work space.

Employees are encouraged to wash their hands often for 20 seconds at a time and are allowed opportunity to do so.

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

We evaluate the need for PPE (such as gloves, face shields, masks). The school has an ample supply of N-95 mask, gloves, face shields, and gown, as required by section 3380. In the event that employees come in contact with a person or child who has a suspected case of COVID-19, they have been trained to use all of the PPE listed above.

Upon request, we provide respirators for voluntary use to any employee who asks for or who are not fully vaccinated, and who are working indoors.

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.

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 procedure 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 **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 during their working hours. The school currently has a contract with ADx to provide rapid testing.
- 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 the principal, vice principal, or office manager. This information has been posted in all areas of the campus.
- That employees can report symptoms and hazards without fear of reprisal/ (Posted)
- Employees needing accommodation for medical or other conditions that put them at increased risk of severe COVID-19 illness should speak with the principal. (Posted)
- Employees can take advantage of the school's free surveillance testing and are also eligible to be tested through their health care provider free of charge. (Posted)
- 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.
- **All employees will be provided access to the school's COVID-19 Prevention Plan and the CSP plan which has detailed information about all aspects of COVID prevention.**

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 whenever possible 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.

All employees attended a presentation by trained staff, reminding all employees of guidelines to follow, proper use of face coverings, hazards to look for, identifying symptoms in students, how and who to report to, etc.

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 criteria is 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 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 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 **granting extra sick leave, if necessary**.
- 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 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 that 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 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 (PCR) COVID-19 test, 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 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.
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The school principal, Kathleen Aymar, has formally approved this program.

Kathleen Aymar, School Principal

Date

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: Kathleen Aymar

Date: August 1, 2021

Name(s) of employee and authorized employee representative that participated: KC Paul, John Walz

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/ 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 form accordingly.]

Date: [enter date]

Name of person conducting the inspection: [enter names]

Work location evaluated: [enter information]

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
[add any additional controls your workplace is using]			
[add any additional controls your workplace is using]			
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			
[add any additional controls your workplace is using]			
[add any additional controls your workplace is using]			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
[add any additional controls your workplace is using]			

Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or persons with 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 un-redacted information on COVID-19 cases that will be provided immediately upon request to the local 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) Un-redacted 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: [enter date]

Name of person conducting the investigation: [enter name(s)]

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 and their authorized representatives.	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: [enter date]

Person that conducted the training: [enter name(s)]

Employee Name	Signature

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

[This section will need to be added to your CPP if your workplace is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in your workplace within a 14-day period. Reference section [3205.1](#) for details.]

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 testing

We will provide COVID-19 testing to all employees, during paid time, in our exposed group except for:

- Employees who were not present during the relevant 14-day period.
- Employees who were fully vaccinated before the multiple infections or outbreak and who do not have symptoms.
- COVID-19 cases who did not develop symptoms after returning to work pursuant to our return-to-work criteria, no testing is required for 90 days after the initial onset of symptoms, or for COVID-19 cases who never developed symptoms, 90 days after the first positive test.

COVID-19 testing consists of the following:

All employees in our exposed workplace will be immediately tested and then tested again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by, the local health department.

- After the first two COVID-19 tests, we will continue to provide COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
- We will provide additional testing when deemed necessary by Cal/OSHA.

We continue to comply with the applicable elements of our CPP, as well as the following:

- Employees in the exposed group wear face coverings when indoors, or when outdoors and less than 6feet apart.
- We give notice to employees in the exposed group of their right to request a respirator for voluntary use if they are not fully vaccinated.
- We evaluate whether to implement physical distancing of at least 6 feet between persons, or where six feet of physical distancing is not feasible, the need for use of cleanable solid partitions of sufficient size to reduce COVID-19 transmission.

COVID-19 investigation, review and hazard correction

In addition to our CPP **Identification and Evaluation of COVID-19 Hazards and Correction of COVID-19 Hazards**, we will immediately perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19.

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
 - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
 - Our COVID-19 testing policies.
 - Insufficient outdoor air.
 - Insufficient air filtration.
 - Lack of physical distancing.
- Updating the review:

- Every thirty days that the outbreak continues.
- In response to new information or to new or previously unrecognized COVID-19 hazards.
- When otherwise necessary.
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We will consider:
 - Moving indoor tasks outdoors or having them performed remotely.
 - Increasing outdoor air supply when work is done indoors.
 - Improving air filtration.
 - Increasing physical distancing as much as possible.
 - Respiratory protection.
 - [describe other applicable controls].

Notifications to the local health department

- Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in our workplace, we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- We will provide to the local health department the total number of COVID-19 cases and for each COVID-19 case, the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and North American Industry Classification System code of the workplace of the COVID-19 case, and any other information requested by the local health department. We will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace.

Additional Consideration #2

Major COVID-19 Outbreaks

[This section will need to be added to your CPP should your workplace experience 20 or more COVID-19 cases within a 30-day period. Reference section [3205.2](#) for details.]

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 testing

We will provide twice a week COVID-19 testing, or more frequently if recommended by the local health department, to all employees present at our exposed workplace during the relevant 30-day period(s) and who remain at the workplace. COVID-19 testing will be provided at no cost to employees during employees' working hours.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees with COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria**, and any relevant local health department orders.

Investigation of workplace COVID-19 illnesses

We will comply with the requirements of our CPP **Investigating and Responding to COVID-19 Cases**.

COVID-19 hazard correction

In addition to the requirements of our CPP **Correction of COVID-19 Hazards**, we will take the following actions:

- In buildings or structures with mechanical ventilation, we will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, we will use filters

with the highest compatible filtering efficiency. We will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems would reduce the risk of transmission and implement their use to the degree feasible.

- We will determine the need for a respiratory protection program or changes to an existing respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- We will evaluate whether to halt some or all operations at our workplace until COVID-19 hazards have been corrected
- Implement any other control measures deemed necessary by Cal/OSHA.

Notifications to the local health department

We will comply with the requirements of our **Multiple COVID-19 Infections and COVID-19 Outbreaks- Notifications to the Local Health Department.**

Additional Consideration #3 COVID-19 Prevention in Employer-Provided Housing

Not Applicable

Additional Consideration #4 COVID-19 Prevention in Employer-Provided Transportation to and from Work

Not applicable