

COVID-19 Prevention Program (CPP) for St. Louis de Montfort School

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

Date: January 31, 2021

Authority and Responsibility

Regina Fox, the school principal, has overall authority and responsibility for implementing the provisions of this CPP in our workplace. Teachers and area supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and 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.
- Follow protocols issued by the Santa Barbara Public Health Department, California Department of Public Health and Center for Disease Control.
- The custodian has been trained for cleaning. He cleans high touch areas, restrooms, classrooms, office using a daily schedule. The areas are cleaned at least twice a day and some areas are cleaned more frequently.

Employee participation

Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by phone or e-mail, scheduling an appointment for in-person or Zoom meeting, or at a weekly faculty meeting. Faculty and staff are able to report any concerns to the office or principal.

Employees check student's temperature upon arrival to school in the car line, with a no touch thermometer. If their temperature is more than 100 degrees, they will have it checked again in a few minutes. If it remains high the parent takes the student home. The student does not enter the campus.

Employee screening

Employees perform health screens prior to arriving on campus and are asked to stay home if they have any one of the Covid-19 symptoms or are not feeling well. Employee temperatures are logged upon arrival to campus. Employees log their temperature and acknowledge that they are symptom free and are well enough to report to work. Everyone is required to wear face coverings while on campus. All staff and faculty have the option of testing through community testing offered in the county of Santa Barbara. An employee can opt for

getting tested by their personal health care professional under their own medical insurance. Staff are tested for Covid-19 every other month with one half of our staff going one month and the other half testing the following month. The staff Covid-19 test results are organized and retained on site.

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:

Unsafe or unhealthy work conditions, practices or procedures are reported to the principal or to the Office Staff. She determines what action is required including gathering additional information or directing staff to adjust correct unsafe or unhealthy conditions, practices, or procedures. She coordinates any necessary training that is needed to correct unsafe or unhealthy conditions, practices, or procedures in a timely manner. If more supplies are needed, they are ordered when needed.

Control of COVID-19 Hazards

Physical Distancing

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

- Placing occupancy limits on shared workspaces such as the office work room and staff lounge
- Limiting the number of available chairs in the staff lounge so that available seats are physically distanced.
- Plexiglass is in the office and barriers are affixed to the wall to prevent traffic in the office area.
- Enforcing single direction traffic follow throughout campus and emphasizing the need to stay distanced including visual cued and signs indicating safe distance.
- Where 6 feet of distance is not possible, students will be seated 4 feet apart at desks with three-sided desk shields. Floor stickers will be below each seat to remind students of the proper placement of their chairs and desks. Class sizes have been limited to accommodate this spacing.
- Some students zoom from home instead of physically being in class.
- Some part-time staff teach virtually.
- Restricting visitors to campus
- Staggered arrival, departure, work, and break times
- Where 6 feet of physical distance is not achievable, staff will stay as far apart as possible.

Face Coverings

We provide clean, undamaged face coverings and ensure they are properly always 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 required by orders from the California Department of Public Health (CDPH) Santa Barbara County Public Health Department (SBCPHD).

- All students and staff have been provided with washable, cloth face masks. Disposable masks are available for anyone on campus in need of a new, clean mask to wear. Any non-employees encountered on campus not wearing masks are provided with a mask and asked to wear it.
- When required for instruction, teachers will wear face screens in accordance with *COVID-19 Industry Guidance: Schools and School-based Programs* from the CA Department of Public Health. The guidance states, "In limited situations where a face covering cannot be used for pedagogical or developmental reasons, (i.e., communicating or assisting young children or those with special needs) a face shield can be used instead of a cloth face covering while in the classroom as long as the wearer maintains physical distance from others to the extent practicable. Staff must return to wearing a face covering outside of the classroom."
- An exception to our face covering policy is 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. There are no cases currently.

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 wearing respiratory protection in accordance with safety orders.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communication with a hearing-impaired person. Alternatives will be considered on a case-by-case basis. There are no cases currently.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19.

Engineering controls

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

- A plexiglass shield has been installed in the front office reception area, between student desks, and between hand washing stations.
- All students wear a face.
- Students will be seated 4 feet apart at desks with three-sided desk shields. Floor stickers will be below each seat to remind students of the proper placement of their chairs and desks. Class sizes have been limited to accommodate this spacing.

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

- The ventilation systems are properly maintained and adjusted when required for proper usage.
- Classroom doors and windows are open throughout the day. Rooms have fans or air conditioning to circulate air flow within the classrooms.

Cleaning and disinfecting

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

- Classes including high-touch areas are sanitized several times each day using EPA registered products from List N in a ULV mister following product usage recommendations before school starts at recess, lunch, and after school.
- Common areas including bathrooms, play equipment, and lunch area are sanitized several times each day using EPA registered products from List N in a ULV mister following product usage recommendations.
- All indoor spaces will also be disinfected with a ULV mister before students return to classrooms the next day.
- The custodian and janitor, along with their supervisor, have reviewed the CDC reopening guidelines for cleaning and disinfecting schools.
<https://www.cdc.gov/coronavirus/2019-ncov/community/reopen-guidance.html>
- The school has purchased EPA-registered products from List N (disinfectants for use against SARS-CoV-2). The school custodial staff has been trained in best practices for both cleaning and disinfecting. They have also reviewed the latest CDC and CAPHD guidance for cleaning and disinfecting public places. The school custodian will also use a ULV mister/sprayer in the bathrooms,

classrooms, picnic tables, and play structures.

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

- The area will be closed off to school personal and students.
- The school custodian will use a ULV mister/sprayer in the areas. The school custodial staff has been trained in best practices for both cleaning and disinfecting with proper equipment. They have also reviewed the latest CDC and CAPHD guidance for cleaning and disinfecting public places.
- Outside cleaning services may be utilized depending on the severity of the cases or outbreak. The area will be shut down until it is cleaned.

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 having the employee clean the item before returning it. The school has purchased EPA-registered products from List N (disinfectants for use against SARS-CoV-2), and employees have been trained to disinfect after using any shared item. We have restricted work room access to shared supplies. Where there must be shared, the items will be disinfected between use. Pens have been labeled as “clean” or “dirty” and are sanitized when necessary.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Students have time scheduled several times each day where they take turns washing hands for 20 seconds.
- Additional hand washing stations have been installed.
- Shields have been installed between hand washing stations.
- Hand sanitizer is available in every classroom and in the office.
- Hand blowers have been replaced with paper towel dispensers.
- Informational posters with proper handwashing technique have been posted throughout campus.

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:

- The person will be isolated immediately and sent home from school.

- Offered testing at no cost during their working hours. Appointments can be made at [lhi.care](#) or at RiteAid. An employee can opt for getting tested by their personal health care professional under their own medical insurance.
- Provided information on benefits described in LA-Archdiocese Handbook Training and Instruction, and Exclusion of Covid-19 Cases.

In the event of a confirmed case among staff or students, the office manager and principal are responsible for gathering the necessary data for contact tracing. The school tracks who are on campus and for how long to assist in the potential need for contact tracing. While parents will not be entering the classrooms, guests coming to the office for assistance or to sign in/out a student are checked in through our visitor system. The purpose and duration of their visit is documented in the system, which creates a spreadsheet. Tracing of staff members will be done through online check in and sign out forms, which includes the ability to create a spreadsheet of dates and times each staff member was on campus.

- In accordance with state and local laws and regulations, school administrators notify local health officials (SBCPHD), staff, and families immediately of any case of COVID-19 while maintaining confidentiality in accordance with the Americans with Disabilities Act (ADA) and FERPA and/or other applicable laws and regulations.
- The designated school tracer will inform those who have had close contact with a person diagnosed with COVID-19 to stay home and self-monitor for symptoms, get tested for COVID-19, and follow CDC guidance if symptoms develop. We will maintain confidentiality as required by the Americans with Disabilities Act (ADA) and Family Educational Rights and Privacy Act (FERPA) and/or other applicable laws and regulations.

The school might need to implement short-term cohort closure procedures if/when an infected person has been on campus during their infectious period and has close contact with others.

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:

- The principal is the Covid-19 key person who all staff Covid-19 symptoms and possible hazards are reported to. Reports of symptoms or hazards are welcomed as our campus' health is a priority.
- Staff that have increased risk of severe Covid-19 illness have been reasonably accommodated with work adjustments such as teaching remotely.
- Amber Rappozo is the key student Covid-19 contact who monitors daily student attendance and absences.
- In the event of a workplace outbreak or exposure, the principal will communicate testing plans and inform affected employees of the need to test and consequences of a positive test. Appointments can be made at [lhi.care](#) or at RiteAid.
- In accordance with state and local laws and regulations, school administrators notify local health officials (SBCPHD), staff, and families immediately of any case of COVID-19 while maintaining confidentiality in accordance with the Americans with Disabilities Act (ADA) and FERPA and/or other applicable laws and regulations.
- The school will give the state mandated notice to co-employees who were at the worksite during the infected employee's infectious period. See section 8-12-2 of the ADLA Administrative Handbook: [Chapter 8-12-2 \(la-archdiocese.org\)](#)

- SchoolSpeak will be used to communicate with parents, students, and community members. All members of a cohort with a confirmed case are notified by letter via email. The office staff will ensure that all families have been notified by ensuring that they have seen their email through SchoolSpeak.

Training and Instruction

We have provided training and instruction including:

- Overview of Covid-19 policies and procedures to protect staff and students.
- Overview of Covid-19 related benefits employees may be entitled to under federal, state, or local laws.
- Knowledge that Covid-19 is an infectious disease that can be spread through the air, or by touching a contaminated object then touching the eyes, nose, or mouth and that infectious person may not have symptoms.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of facecoverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

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

Exclusion of Covid-19 Cases

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we have demonstrated that the COVID-19 exposure is work related. This will be accomplished by utilizing sick leave benefits, payroll funds, or other means 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, 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

- The employee is to consult with a doctor and request a note to return to work. While a doctor's note is preferable, if an employee is not showing symptoms and has quarantined the full 10 days, they are allowed to return to the workplace.
- Anyone who has been exposed to COVID-19 must quarantine at home for 10 days and continue to monitor his or her health for an additional 4 days. This means that the exposed person must remain at home for the entire quarantine period, even if the exposed person tests negative during the quarantine period. If an exposed person has no symptoms through the 10th day, the exposed person may return to work or ministry.
- An infected person must isolate at home (within one room and bathroom if possible) until such time as the infected person is released by a doctor. All infected employees returning to work must present a licensed health care provider's note fully releasing the employee to return to work, or other appropriate confirmation to the same effect.

Date: January 31, 2021

Signature; *Regina Fox*

Principal for St. Louis de Montfort School