

# COVID-19 Prevention Program (CPP) for Prince of Peace Christian School Fremont, CA

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

**Date: 2/8/2021**

## Authority and Responsibility

The Principal, Jennifer Cid, 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.

## Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by formal training and daily review of COVID-19 safety policies and procedures.

## Employee screening

We screen our employees by: *Temperature Checks at the beginning of the day, daily COVID checklist questions, monthly COVID tests*

## 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:

Hazards will be corrected within a 12-hour time. The facilities manager and administration will be responsible for this correction. Follow-up will occur on a weekly basis.

## 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:

- Students must remain in the same space and in cohorts as small and as consistent as practicable including recess and lunch.
- Class cohorts may be as big as 16 students and will only allow as many students as space allows for social distancing practices not to exceed 16 students.
- On February 16, 2021, students in Kindergarten through 5<sup>th</sup> grade will begin in person learning with class sizes around 12 students. Simultaneous in-person and distance learning will occur.
- The same students and teachers will be kept together in a stable group to the greatest extent possible. Using ACPHD Guidance, groups will remain stable for at least 3-4 weeks as practicable. If a new student enrolls, they can be placed into an already established cohort. Start date and enrollment will be determined by the school administration.
- Movement of students and teachers will be limited as much as possible. A classroom teacher leading a grade level small group will be the main adult interacting with the students.
- Interactions between small groups will be avoided as much as possible. Students will not move from one group to another. Groups will be kept separate from other groups.
- Teachers providing instruction for classes such as music and Spanish will do so using Zoom or other distance learning tools, or these classes will be conducted outside.
- PE will be conducted outside when possible. Students will still practice social distancing and will not share equipment such as balls, jump ropes, or hula hoops. Any equipment that is used, will be properly disinfected before the next students use. If PE is conducted in the gym, students will be spaced out and doors will be open for ventilation.
- Visitors, volunteers, and guests are not allowed in the classroom without approval from administration. 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 local health department. Students come to school with cloth face masks. Extra masks are in every classroom. Face shields are optional. All persons on campus are required to wear a mask. Students may only remove their mask when eating at snack time and lunch time.

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.

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: desk shields, marks on the ground, students are outside

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

- All HVAC systems have been checked by a professional service provider and have been equipped with filters meeting the EPA guidelines for air handling during the COVID-19 pandemic.
- Classroom windows are open.

## **Cleaning and disinfecting**

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

- Frequently touched hard surfaces (desks, chairs, tables, door handles, copy machines, light switches, phones, remote controls), restroom surfaces (toilets, countertops, faucets), playground equipment, books, art supplies, and games will be cleaned and disinfected per CDC Guidance throughout the day.
- Cleaning and handwashing breaks will be incorporated in the daily schedule.
- Shared items in the classroom have been removed or placed on a schedule for use to allow for cleaning/disinfecting between use. Teacher supervision will be used to ensure one student at a time uses an item and can be cleaned/disinfected properly - in between uses.
- Each student will have their own supplies to use during the day. This includes pencils, paper, glue, scissors, markers, and other needed supplies.
- All classrooms will be cleaned and disinfected after each group sanitizing the hard surfaces, sinks, light switches, door handles, countertops and other spaces that may have touched. The playground will be disinfected after each use by applying EPA approved sanitizer to the touched surfaces in between groups.
- The playground structures will be used by one class per day and cleaned at the end of the day.
- Playground equipment will be sanitized after every use.
- Each classroom used by teachers and students will be equipped with disinfecting wipes and spray, hand sanitizer, soap and water.
- Each day, classrooms will be cleaned and disinfected by the janitorial crew using approved EPA products and CDC guidelines.

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

- Any positive COVID-19 cases will be reported to the Alameda County Public Health Department immediately.
- School administration will notify staff and families with an email and text notification of any positive COVID-19 cases in their classroom. Confidentiality will be exercised to protect those involved.
- Areas used by sick students or staff will be closed off until cleaned and disinfected using the appropriate cleaning methods and disinfectants.
- The students and teacher of a classroom with a confirmed COVID-19 case are instructed to get tested and need to be quarantined for 14 days. Distance learning will take place for that classroom.
- Notification to the ACPHD will be completed by the school office staff. Date and time of call will be documented.
- Depending on the exposure or possibility of exposure, letter templates are prepared to email to the affected parents and staff. Letter templates are included at the end of this plan

## **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 cleaning after every use. All shared spaces are equipped with disinfecting spray and 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:

- Children and staff will wash their hands upon entering their classrooms, after each recess before returning to their desks. They will also wash their hands before eating and anytime they use the restroom. Handwashing and cleaning breaks are incorporated into the daily schedule.
- Signage is posted around campus reminding students and staff to properly wash their hands and how to cover coughs and sneezes and other preventative measures.
- Students and staff will be taught and reminded that washing hands with soap and water for at least 20 seconds is the preferred method to remove germs.
- If soap and water are not available, students and staff will use hand sanitizer following the CDC guidelines for alcohol content of at least 60%.
- Teachers will reinforce handwashing in the classroom through regular modeling, teaching, reminding, and monitoring.
- Every classroom has its own sink.

## **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:

- Employee must make an appointment through healthcare provider. Workplace pays the co-pay. A substitute teacher is hired.
- Staff have undergone and will continue to undergo training regarding procedures and guidelines for COVID-19. Faculty meetings and in-service days will be used to reinforce procedures and to adjust to changes set forth by California and Alameda County.
- All staff have been given COVID-19 guidelines and the Prince of Peace Covid-19 plan. They have been asked to review, seek clarification, and sign-off on understanding the plan.

## **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, to school office and administration through phone call or text message.
- 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 through their healthcare provider or drive through testing site.
- 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.

- 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.
- After contact tracing, families of students in that grade level are informed of the potential exposure.

## 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.
- Parent Training via Zoom before the reopening of campus.

**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've demonstrated that the COVID-19 exposure is work related. This will be accomplished by sick leave and continued pay roll.
- 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 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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Jennifer Cid, Signature: *Jennifer Cid*

Date: 2/8/2021

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## 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:** Jennifer Cid

**Date:** 2/1/2021

**Name(s) of employee and authorized employee representative that participated:** Dan Dueck, Peter Berg, Erin Beckett, Tina Stephen

Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards	Places and times	Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers	Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation
School Day instruction	Classrooms 8 am – 2 pm	Teachers, students, parent volunteer	Updated HVAC Open windows Desk shield Masks

## Appendix B: COVID-19 Inspections

Name of person conducting the inspection: Dan Dueck and Jennifer Cid

Work location evaluated: School Site - Classrooms, bathrooms, workrooms

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
<b>Administrative</b>			
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			
<b>PPE (not shared, available and being worn)</b>			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			

## 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 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) 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:** [enter date]

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

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

**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):**

<b>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:</b>			
<b>All employees who may have had COVID-19 exposure and their authorized representatives.</b>	<b>Date:</b>		
	<b>Names of employees that were notified:</b>		
<b>Independent contractors and other employers present at the workplace during the high-risk exposure period.</b>	<b>Date:</b>		
	<b>Names of individuals that were notified:</b>		
<b>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</b>		<b>What could be done to reduce exposure to COVID-19?</b>	
<b>Was local health department notified?</b>		<b>Date:</b>	

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

## Appendix D: COVID-19 Training Roster

Date: 2/1/2021

Person that conducted the training: Jennifer Cid

Employee Name	Signature

## **Additional Consideration #1**

### **Multiple COVID-19 Infections and COVID-19 Outbreaks**

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 in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period. COVID-19 testing will be provided at no cost to employees during employees' working hours.
- 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.

#### **Exclusion of COVID-19 cases**

We will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria** requirements, and local health officer orders if applicable.

#### **Investigation of workplace COVID-19 illness**

We will immediately investigate and determine possible workplace-related factors that contributed to the COVID-19 outbreak in accordance with our CPP **Investigating and Responding to COVID-19 Cases**.

#### **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.