COVID-19 Prevention Program (CPP) for Notre Dame High School

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

Date: 1/29/21

Authority and Responsibility

John Bracco, Vice-Principal, Student Affairs 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:

- 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.
- [Enter other identification and evaluation measures you take in your workplace].

Employee participation

Employees and their authorized employees’ representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: Classroom teachers are encouraged to partner with school administration to assess if current on campus mitigation measures are adhering to county and state guidelines.

Employee screening

We screen our employees by: Employees do a self health verification on days they work and record results via a phone app. Health verification includes acknowledging no COVID-19 symptoms, on or off campus work status, date of last COVID-19 test/results as well as noting any recent travel. Employees who work on campus must complete an additional health screening using the phone app that acknowledges employee's entry status using non contact thermometer to measure temperature and acknowledges required PPE.

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 and correction time frames assigned, 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:

Describe your specific workplace methods, which can include:

- Faculty and Staff may continue to work from home. Faculty/staff who chose to work on campus must follow physical distancing protocols at all times.
- Areas open to visitors are limited. All visitors must register and submit to a health screening prior to entry.
- Visual signs and floor markings indicate the path of travel.
- The limited number of employees and students on campus do not require staggered starts
- Employees and students commit to complying with all physical distancing requirements when on campus.

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. Faculty, staff and students are required to bring their own face coverings that comply with CDC guidelines. CDC recommended face coverings are available upon request.

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: The main office and additional receptionist areas have plexiglass barriers. Plexiglass barriers are installed on teacher’s desks by request. All teachers’ desks are located at least six feet from students.

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

- Increasing flow of fresh air into HVAC Systems in all buildings.
- Installing MERV13 filters in all HVAC Systems.
- Opening windows in buildings where windows can be opened.
- Ventilation systems in buildings are checked weekly and adjusted as needed.
Cleaning and disinfecting

We implement the following cleaning and disinfection measures for frequently touched surfaces:
[describe your workplace-specific measures, including:
  - Faculty, Staff and students are asked to clean and disinfect frequently touched surfaces.
  - Daily janitorial service cleans frequently touched surfaces and offices at the end of each day.
  - CDC recommended disinfectant and cleaning materials are available in all offices, classrooms and work stations.

Should we have a COVID-19 case in our workplace, we will implement the following procedures:
  - Immediately close off the area where the infected person visited.
  - Clean all frequently touched surfaces.
  - Use a CDC recommended disinfectant fogger to all rooms, hallways and areas where the infected person visited.

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 Faculty staff and students are instructed as to the proper use of disinfectant and cleaning of any shared equipment.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:
[describe your site-specific procedures, including:
  - Have installed hand sanitizer stations at the entrances to all buildings.
  - Hand sanitizer dispensers have been installed in all classrooms & hallways.
  - All offices and non-classroom areas are equipped with hand sanitizer.
  - Portable handwashing stations are located outside, near the outside seating area.
  - Signs are posted encouraging faculty, staff and students to frequently 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. [reference section 3205(c)(E) for details on required respirator and eye protection use.]

We provide and ensure use of eye protection and respiratory protection in accordance with section

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 during their working hours.
  - 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 Employees should alert the Vice-Principal of Student Affairs and the Facilities Manager via phone, text or email. It has been communicated 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. Employees who are working on campus are required to test monthly. Starting in February, on-site COVID 19 Testing will be available for all employees and students.
- 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. Notre Dame would provide free testing for any employee exposed to COVID-19, and follow county reporting and scenario guidelines for any student exposures.
- 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. We have weekly communications that address these issues and ask employees to provide feedback. Issues are addressed and communicated in a timely manner.

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.

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: employer-provided employee sick leave benefits, payments from public sources or other means of maintaining earnings, rights and benefits, 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, 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:
  o At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
  o COVID-19 symptoms have improved.
  o 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.

John Bracco, Vice-Principal, Student Affairs, Notre Dame High School 1/29/21