



# **COVID-19 Prevention Plan (CPP)**

**June 2, 2022**

# Overview



June 2022



## **COVID-19 Prevention Program (CPP) for Sacred Heart Nativity Schools**

This CPP is designed to control employees' exposures to the SARS-CoV-2 virus (severe acute respiratory syndrome coronavirus 2) that causes COVID-19 (Coronavirus Disease 2019) that may occur in our workplace.

**Date: June 2, 2022**

### **Authority and Responsibility**

The President of Sacred Heart Nativity Schools 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.
- Document the vaccination status of our employees by using, "**COVID-19 Employee Vaccination Status 7 Testing Listing**" Excel Spreadsheet which is maintained as a confidential medical record.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Develop and implement COVID-19 policies and procedures to respond effectively and immediately to individuals at the workplace who are a COVID-19 case to prevent or reduce the risk of transmission in the workplace
  - COVID-19 case is instructed to isolate immediately and physically excluded from work.
  - HR conducts a phone call with COVID-19 case to determine symptoms onset and testing details as well as close contact information.
  - COVID-19 case is emailed with COVID-19 Positive Case Letter as well as guidance on isolation and return to work requirements.
  - Close contacts are contacted via phone and informed of the exposure, testing instructions, and face mask requirements in accordance with the CDPH. Close contact is instructed to monitor for symptoms and stay home if symptomatic. A Close contact letter is also emailed to the individual summarizing the details shared in the phone call.
  - School building and worksite are sanitized.
  - A "general exposure letter/ notice of a COVID-19 cases" is sent to the Nativity community and all those present at the worksite while COVID-19 case was infectious.
  - COVID-19 case is reporting on the SPOT portal
  - HR/ COVID-19 Designee follows up with COVID-19 case to assess their return-to-work date based on their symptoms and testing status.
  - HR/ COVID-19 Designee follows up with close contacts for COVID-19 test results.
- 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 including:

- [Cal/OSHA-CDPH Interim Guidance for Ventilation, Filtration, and Air Quality in Indoor Environment.](#)
- [CDPH Face Covering Requirements.](#)
- [CDPH Isolation and Quarantine Guidance.](#)
- [Applicable CDPH Employees & Workplaces Guidance.](#)
- 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 and evaluate unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.
- Evaluate current working/operating conditions meet the recommended standards by the CDPH and Santa Clara County COVID-19 Designee Trainings for schools.

## **Employee participation**

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

- The schools' COVID-19 Facilities Readiness Committee comprised of teachers, staff, and essential volunteers conducted an inspection of the school building to identify COVID-19 hazards which were addressed prior to the school reopening in conjunction with the participation of employees. A school Reopening Plan Sacred Heart Nativity Schools Reopening Plan was consequently prepared based on results of these elevations. Common areas, classrooms, staff offices, and hallways were inspected by the Facilities Committee and corresponding employees to identify COVID-19 hazards and were subsequently modified to address the issues.
- Google Form was sent to employees so that they may request personal cleaning supplies.
- All employees are encouraged to notify their supervisor of any COVID-19 hazards they identify so that they are resolved.
- All employees are invited to participate in periodical facilitates evaluations to identify potential COVID-19 hazards (Appendix A: Identification of COVID-19 Hazards).

## **Employee Screening**

We screen our employees and respond to those with COVID-19 by:

- All employees are required to prescreen themselves for COVID-19 symptoms based on CDPH guidelines daily prior to entering the school building. Non-contacts thermometers are located throughout campus to be used by employees as needed.
- Employees have been educated on COVID-19 symptoms and the importance of completing such daily assessments through a combination of Nativity training, materials, and the County of Santa Clara's "COVID-19 Symptom Self Check" PSA.
- Nativity provides onsite weekly COVID-19 testing to all employees, volunteers, and students that is free of cost and highly encourages employees to participate. Nativity also maintains a supply of at-home COVID-19 tests for employees to use when symptomatic or when identified as a close contact. Additionally, a list of free testing sites in Santa Clara County has been provided to all employees. Employees have been trained on the importance of competing COVID-19 routine training through the Santa Clara County's "Facts About Routine Testing" PSA (insert link).
- Volunteers and visitors are required to complete the Nativity Volunteer & Student Screening Form when entering the school building. These forms can be accessed online and via QR codes located throughout the school.

## 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 staff reports any unsafe or unhealthy conditions in the facility to the President's Office for assessment and immediate correction.

## Control of COVID-19 Hazards

### Face Coverings

- We provide clean, undamaged face coverings and ensure they are properly worn by employees when required by orders from the [California Department of Public Health \(CDPH\)](#).
- Disposable face masks are available to employees and are located at the main entrance of the school building and the Front Office. Nativity keeps a large inventory of face masks in the supply closet accessible to all employees and encourages employees to take a supply of masks to retain in their individual workstations. Cloth facemasks and N95 masks are also available to employees and are located in the supply closet.
- Employees have been educated on the benefits of wearing facemasks and on how to properly wear face coverings via the Santa Clara County, "[Protect Yourself from COVID-19](#)" PSA Series.
- Face covering guidance is implemented based on the recommendations in accordance with guidance from the CDPH and Office of Education. Face covering requirements in the workplace are communicated to non-employees via signage located at the Front Entrance of the school building and in front of the visitor screening station.

Employees required to wear face coverings in our workplace may remove them under the following conditions:

- When an employee is alone in a room or a vehicle.
- While eating or 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 feasible.
- When employees are required to wear respirators in accordance with our respirator program that meets section 5144 requirements.
- 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. Such employees will wear an effective, non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition permits it. If their condition does not permit it, then the employee will be tested at least weekly for COVID-19.
- Specific tasks that cannot feasibly be performed with a face covering. This exception is limited to the time in which such tasks are being performed.

Any employee not wearing a required face covering will be tested at least weekly for COVID-19.

We will not prevent any employee from wearing a face covering when it is not required unless it would create a safety hazard, such as interfering with the safe operation of equipment.

Face coverings will also be provided to any employee that requests one, regardless of their vaccination status.

### 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, or other air cleaning systems, would reduce the risk of transmission by:

- Keeping all interior doors open all day while staff/ students are on campus.
- Opening windows to maximize ventilation.
- Ensuring that the HVAC System is working properly and replacing/ servicing filters on a frequent basis. The President of the school manages the facility in partnership with the landlord.
- Making oscillating fans available to optimize ventilation and increase filtration efficiency when outside air needs to be minimized due to hazards such as heat and wildfire smoke.
- Periodically audit engineering controls to ensure that they are in compliance with CDPH's Interim Guidance for Ventilation, Filtration and Air Quality in indoor environments.

### **Hand sanitizing**

To implement effective hand sanitizing procedures, we:

- Evaluated hand washing facilities.
- Determined the need for additional facilities and equipped each classroom with a no touch hand sanitizer station.
- All classrooms with sinks and are equipped with no-touch soap and paper towel dispensers.
- Provide ongoing explicit instruction of hygiene practices including video instruction through the Santa Clara County [Protect Yourself from COVID-19](#) PSA.
- Encourage and allowing time for employee hand washing.
- Provide employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Encourage employees to wash their hands for at least 20 seconds each time.

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

We evaluate the need for PPE (such as gloves, goggles, and face shields) as required by section 3380, and provide and ensure use of such PPE as needed.

Upon request, we provide respirators for voluntary use to all employees who are working indoors or in vehicles with more than one person. All employees are informed of Nativity's inventory of n95 masks via email. Employees can request a respirator for voluntary use by emailing [hr@shnativity.org](mailto:hr@shnativity.org). HR will then supply the employee with a respirator of the correct size and provide them with a copy of [Appendix D of section 5144](#) and encourage them to use them in compliance with the information provided.

We provide and ensure use of respirators in compliance with section 5144 when deemed necessary by Cal/OSHA.

### **Testing of symptomatic employees**

We make COVID-19 testing available at no cost, during paid time, to all employees:

- Who had close contact in the workplace; or
- Who have COVID-19 symptoms, and
- During outbreaks and major outbreaks (see below for further details).



## Investigating and Responding to COVID-19 Cases

We have developed effective procedures 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 in accordance with **APPENDIX C: Investigating COVID-19 Cases Form**.

We also ensure the following is implemented:

- Employees that had a close contact are offered COVID-19 testing at no cost during their working hours, except for returned cases as defined in 3205(b)(11). Employees are supplied with at home test kits, onsite COVID-19 testing on designated day of the week and offered coverage or accommodations if testing with their medical provider during operating hours.
- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to these employees via email by HR.
- Written notice within one business day of our knowledge of a COVID-19 case that people at the worksite may have been exposed to COVID-19. This notice will be provided to all employees (and their authorized representative), independent contractors and other employers on the premises at the same worksite as the COVID-19 case during the infectious period. These notifications will meet the requirements of T8CCR section 3205(c)(3)(B) and Labor Code section 6409.6(a)(4); (a)(2); and (c) and will be distributed via email and/or on SchoolSpeak.
- We consider a “close contact” that meets the definition in section 3205(b)(1), unless it is otherwise defined by CDPH; “infectious period” meets the definition in 3205(b)(9), unless it is otherwise defined by CDPH; and “worksite” meets the section 3205(b)(12) definition.]

## 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, possible close contacts, and hazards to, and how.
  - Employees should report COVID-19 symptoms, possible close contacts, and hazards to their managers who will in turn notify the COVID-19 Designee and HR. These can be voiced via text message or phone call, email or during staff meetings.
  - That employees can report symptoms , possible close contacts and hazards without fear of reprisal.
- How employees with medical or other conditions that put them at increased risk of severe COVID-19 illness can request accommodations by emailing, [hr@shnativity.org](mailto:hr@shnativity.org) or requesting an in-person meeting with their supervisor and HR.
- Access to COVID-19 testing when testing is required. In the event of a COVID-19 workplace outbreak, and in compliance with CCR Title 8 section 3205.1, Multiple COVID-19 Infections and COVID-19 Outbreaks, as well as section 3205.2, Major COVID-19 Outbreaks, Nativity will communicate the plan for providing testing at no cost to affected employees during working hours via email. <https://www.sccgov.org/sites/covid19/Pages/covid19-testing.aspx>
- The 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. In compliance with confidentiality requirements for COVID-19 cases, Nativity will communicate information related to COVID-19 hazards while not identifying the identity of the COVID-19 case.
- Workplace communication with employees is accomplished through a combination of in-person meetings, emails and written signage posted throughout the school building.



## Training and Instruction

We provide effective employee training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards, and how to participate in the identification and evaluation of COVID-19 hazards.
- Information regarding COVID-19-related benefits (including mandated sick and vaccination leave) 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.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing, face coverings, increased ventilation indoors, and respiratory protection decrease the spread of COVID-19 and are most effective when used in combination.
- The right of employees to request a respirator for voluntary use, as required by section 3205, without fear of retaliation, and our policies for providing those respirators. Employees voluntarily using respirators will be provided with effective training and instruction according to section 5144(c)(2) requirements, including:
  - How to properly wear them; and
  - How to perform a seal check according to the manufacturer's instructions each time a respirator is worn, and the fact that facial hair can interfere with a seal.
- 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. Since COVID-19 is an airborne disease, N95s and more protective respirators protect the users from airborne disease, while face coverings primarily protect people around the user.
- The conditions where face coverings must be worn at the workplace.
- That employees can request face coverings and can wear them at work regardless of vaccination status and without fear of retaliation.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- Information on our COVID-19 policies and how to access COVID-19 testing and vaccination, and the fact that vaccination is effective at preventing COVID-19, protecting against both transmission and serious illness or death.
- Several employees are trained as COVID Designees and attend COVID-19 trainings provided by the County of Education's Office of Education
- Employees were provided with COVID-19 Information Sessions and Slide Deck Materials
- Employees are actively provided with updated COVID-19 policies, literature and information including the County of Santa Clara's Stronger Together PSA Series. Documentation of training completion by employees are provided via email upon completion.

**Appendix D: COVID-19 Training Roster** will be used to document this training as well as email documentation.

## Exclusion of COVID-19 Cases

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

- Ensuring that COVID-19 cases are excluded from the workplace until the return-to-work requirements in section 3205(c)(10) are met.
- Reviewing current CDPH guidance for persons who had close contacts, including any guidance regarding quarantine or other measures to reduce transmission.
- Developing, implementing, and maintaining effective policies to prevent transmission of COVID-19 by persons who had close contacts.
- For employees excluded from work, continuing, and maintaining employees' earnings, wages, seniority, and all other employees' rights and benefits. This will be Nativity's sick and time-off policies such as Nativity's "COVID-19 Sick Time."
- 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 and outbreaks at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with 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 and/or the "Faculty & Staff COVID-19 monitoring"** spreadsheet to keep a record of and track all COVID-19 cases.

## Return-to-Work Criteria

We will meet the following return to work criteria for COVID-19 cases and employees excluded from work:

- **COVID-19 cases, regardless of vaccination status or previous infection and who do not develop symptoms or symptoms are resolving**, cannot return to work until we can demonstrate that all of the following criteria have been met:
  - At least five days have passed from the date that COVID-19 symptoms began or, if the person does not develop COVID-19 symptoms, from the date of first positive COVID-19 test;
  - At least 24 hours have passed since a fever of 100.4 degrees Fahrenheit or higher has resolved without the use of fever reducing medications; and
  - A negative COVID-19 test from a specimen collected on the fifth day or later is obtained; or, if unable to test or the employer chooses not to require a test, 10 days have passed from the date that COVID-19 symptoms began or, if the person does not develop COVID-19 symptoms, from the date of first positive COVID-19 test.
- **COVID-19 cases, regardless of vaccination status or previous infection, whose COVID19 symptoms are not resolving**, may not return to work until:
  - At least 24 hours have passed since a fever of 100.4 degrees Fahrenheit or higher has resolved without the use of fever-reducing medication; and
  - 10 days have passed from when the symptoms began.
- COVID-19 tests may be self-administered and self-read only if the following independent verification of the results can be provided:
  - Time-stamped photograph of the results
  - Observed by a COVID-19 Designee or HR
- Regardless of vaccination status, previous infection, or lack of COVID-19 symptoms, a COVID-19 case shall wear a face covering in the workplace until 10 days have passed since the date that COVID-19 symptoms began or, if the person did not have COVID-19 symptoms, from the date of their first positive COVID-19 test.
- The return-to-work requirements for COVID-19 cases who do or do not develop symptoms apply regardless of whether an employee has previously been excluded or other precautions were taken in response to an employee's close contact or membership in an exposed group.
- If an order to isolate, quarantine, or exclude 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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Ruben Jr.

President, Sacred Heart Nativity Schools

9/9/22

Date

