

# *COVID-19 SAFETY PLAN (CPP)*



LE LYCÉE FRANÇAIS  
DE LOS ANGELES

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# 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/](http://www.dir.ca.gov/dosh/coronavirus/)



November 2020

# COVID-19 Prevention Program (CPP) for Le Lycée Français de Los Angeles

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

**Date:** Jan 29, 2021

## Authority and Responsibility

Clara-Lisa Kabbaz (Headmaster), Josette Cole, (Director), and Sergio Parreira (COVID Liaison) 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.
- The school will comply with all reporting, recording and confidentiality obligations as required by law. Contact tracing and immediate notification for all suspected and confirmed cases. All rules for quarantine and testing will be followed.
- Bi-weekly PCR testing for all staff and students that come to any of our campuses for work or learning.
- Zero transmitted cases to date. Immediate reporting as per new rules for any cases on campus

## Employee participation

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

Each and every employee understands the parameters and gravity of this virus and is responsible as a community member to be alert and identify any hazard, i.e., mask compliance, self-screening, mixing cohorts, social distancing. They should report any concerns immediately to Sergio Parreira (COVID Liaison)

## Employee screening

We screen our employees by daily self-survey questionnaire via the App "ParentSquare". Daily no-contact thermometers are used for temperature checks before coming onto campus. Should an employee present any COVID symptoms at this time they will be asked to remain at or return home, and not return to school until the employee satisfies the minimum requirements as set forth by the CDC.

## 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:

Thus far we have been commended for our safety implementation – as soon as any hazard or non-compliance issue is identified the school will correct it immediately. Mrs. Kabbaz, Mrs. Cole, and Mr. Parreira will be responsible for investigating, implementing and updating any policies or practices to ensure safe and healthy conditions.

## 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:

- Eliminating the need for workers to be in the workplace – e.g., telework or other remote work arrangements. (half of our employees are currently working from home, others telework when possible. Although remote work arrangements are made – this is a school and staff must be on hand for childcare and in their individual offices with ventilation and closed doors if they wish.
- No visitors allowed on campus and all meetings are conducted via ZOOM
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel. One-way paths and designated lunch areas for distancing have been implemented.
- Staggered arrival, departure, work, and as well as break and lunch times.
- Our school benefits from large campuses and ample space for distancing and plexiglass barriers are also installed in all classrooms.

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.

Disposable masks and well as re-useable masks and face shields and goggles (where needed) are generously distributed to all. If employees require more PPE supplies, they ask Mr. Parreira. There are no non-employees on our grounds. Signage and security guards are plentiful, and each employee is empowered to remind everyone that a face mask must be properly worn at all times while on campus.

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: There is ample space, but every desk is equipped with large plexiglass dividers.

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

All the school campuses are equipped with hospital grade MERV 13 air filters throughout the buildings. As we own our facilities, we have our licensed contractor schedule filter changes when appropriate and according to manufacturer recommendations. MERV 13 filtration is the highest efficiency system.

### **Cleaning and disinfecting**

We implement the following cleaning and disinfection measures for frequently touched surfaces: Sanitization time charts must be regularly filled out by our fulltime maintenance team for increased periodic disinfecting of facilities, and frequently touched surfaces. Early education aides regularly disinfect toys and equipment using the Green bins for clean toys and Red Bins for used toys. There is no sharing of materials. Students each have their own writing materials, books, etc which remain at their desk. Every teacher has their own dry erase board and supplies and may use rubber gloves if they wish.

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

Any classroom or area used by the COVID positive case will be cleared of people immediately and disinfected thoroughly by our maintenance team wearing all the necessary PPE. These areas are left empty during quarantine.

### **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.

Employees have their own equipment – extremely minimal sharing. Sanitizing towelettes are readily available as well as hand sanitizer for everyone and replenished frequently. Employees are encouraged to clean any equipment before and after use. The school invested in several medical grade ultraviolet light disinfecting devices as well.

### **Hand sanitizing**

In order to implement effective hand sanitizing procedures, we:

There are ample hand washing and sanitation facilities throughout the campuses (ethyl alcohol hand sanitizing dispensers are at all entry and exits, as well as in hallways, kitchens and bathrooms). In addition to many handwashing stations outside and in bathrooms. Employees are encouraged to wash their hands often through communications and signage (at least 20 secs) and given ample time to maintain hygiene.

### **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. The school has a supply at all times of masks, gloves, face shields and goggles. Employees may also wear their own masks as long as they are compliant.

## **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:

- Employees should immediately report COVID-19 symptoms and possible hazards to their Head of Campus and Sergio Parreira via email or phone. Additionally, [generalinfo@lyceela.org](mailto:generalinfo@lyceela.org) and Mrs. Kabbaz can also be alerted as necessary.
- Employees can report symptoms and hazards without fear of reprisal – confidentiality is taken seriously.
- Detailed 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, employees can access COVID-19 testing (via our partner PathMD)

## Testing is offered and required

- 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 testing will be through PathMD – our partner PCR testing provider.
- 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 will also be detailed via email, etc including, but not limited to alerts through ParentSquare, Headmaster's weekly video addresses and periodic newsletters.

## 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. (Initial training was in Fall 2020, next training will include the completion of the proposed Roster)

## 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 providing more than 70 days off during the calendar year. Additionally, each employee has sick leave for up to 40 hours plus an additional 80 hours for COVID related absences.
- 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.
- Aside from contact tracing in the traditional sense – we review security footage to further identify any contact with the COVID positive case.

## 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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Clara-Lisa Kabbaz, Headmaster and President – Jan 29, 2021