

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 CPP template. Employers can also create a written CPP 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/



November 2020

COVID-19 Prevention Program (CPP) for Flintridge Preparatory School

This CPP is designed to control exposures to the SARS-CoV-2 virus that may occur on campus.

Date: January 29, 2021

Authority and Responsibility

The Flintridge Preparatory School Administration has overall authority and responsibility for implementing the provisions of this CPP on campus. In addition, all directors 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 on campus:

- 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 campus.
- 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 on campus 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 are encouraged to participate in the identification and evaluation of COVID-19 hazards through open communication with our COVID Team, and staff in our Facilities and Campus Safety Departments.

Employee screening

We screen all employees by requiring use of the Magnus self-screen application, completed by each employee daily before arriving to campus. The campus is locked, with only one outdoors point of entry, monitored by a member of our Campus Safety Department. Temperatures are verified with a non-contact thermometer at the point of campus entry. All essential employees must be masked and socially distanced at all times on campus unless alone in a private space, with door(s) shut.

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 School follows California Department of Public Health, Los Angeles Department of Public Health, CDC and other public health safety guidelines, including ventilation evaluation and upgrades, custodian upgrades, staffing reorganization, remote working, equipment purchases, and provision of PPE to all

employees on campus. Hazards are corrected immediately.

Individuals responsible for ongoing campus protocols include all members of the COVID Team, the Director of Campus Safety, and Athletic Director.

Control of COVID-19 Hazards

Physical Distancing

Where possible, we ensure at least six feet of physical distancing at all times on campus.

- The campus normally accommodates 650 +/- people, including students, faculty, staff, and visitors, spread over 7.5 acres. As a result of COVID, under 50 employees are on campus any given day. All employees have an assigned classroom or office, with very limited shared space.
- Campus dining is closed; communal dining on campus is not permitted. Breaks are taken on an individual basis.
- Most teachers, staff and administrators continue to work remotely.
- Visitors are not permitted on campus. Vendors and repair personnel are required to complete COVID screening, including temperature-taking, before entering campus.
- COVID signage, hand sanitizer, tissues, fans, and air purifiers are located throughout campus. Doors remain open wherever possible, to increase circulation of outside air.
- Individuals are kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

Face Coverings

The school provides clean, undamaged face coverings and ensures they are properly worn by employees over the nose and mouth at all times, indoors and outdoors, with the exceptions listed below. Campus face covering protocols are communicated on an ongoing basis and the school maintains a policy of providing a supply of face coverings at no cost. Non-employees who are not wearing face coverings are not permitted to be on campus.

The following are exceptions to the use of face coverings on campus:

- When an employee is alone in their assigned classroom or office, with the door closed.
- While eating and drinking on campus, provided employees, if present, are at least six feet apart and outside or, if indoors, air supply to the area 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 are 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: provision for solid partitions.

Currently, given the low number of employees on campus, the school is able to provide a dedicated space for each teacher, staff member, and administrator. Zoom, phone calls, emails, or meetings outdoors, with six feet distancing, are the preferred method of meeting and communicating.

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

- Last fall, the school hired an industrial hygiene and safety consultant to conduct a campus-wide

assessment of HVAC systems, measure CFM of airflow to calculate ACH, and evaluate high-touch surface cleanliness. Based on those findings, the school evaluates best-case scenarios for ventilation on an ongoing basis with the use of MERV-13 equipped HVAC systems, supplemental HEPA air purifiers, and/or open doors and windows with accompanying floor fans if outside air conditions are favorable.

- The school has procured a supply of MERV-13 filters which are being changed according to current guidelines for replacement.
- The school is installing operable windows in a number of spaces where windows were previously fixed.

Cleaning and disinfecting

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

- Activity on campus has been and currently remains reduced to only essential workers. Nevertheless, the school has retained its full staff of campus evening custodians and day porters, along with reassigned campus dining employees to custodial services, in order to avoid layoffs and supplement cleaning for essential employees on campus. The crews are provided adequate supplies and adequate time to complete recommended cleaning cycles of three cleaning per day and hourly disinfecting.
- The school continues to follow Public Health guidelines, as provided by Cal/OSHA, California Department of Public Health, Los Angeles Department of Public Health, and other agencies, regarding frequency and scope of cleaning and disinfection. Employees have been informed of the increase in cleaning protocols and practices through regularly scheduled email communications and group meetings.

Should we have a COVID-19 case in our workplace, we will implement the following procedures: The school's campus custodian services are outsourced to a company which is fully apprised of required COVID mitigation cleaning protocols. In the event of a COVID-19 case on campus, a two-day plan has been established to clean and disinfect the areas, materials, and equipment possibly infected. Additionally, the school has purchased two Clorox-360 machines, to provide additional layers of mitigation on campus.

Shared tools, equipment and personal protective equipment (PPE)

PPE are not 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 are also not shared, to the extent feasible. Currently, the only shared items on campus are pens supplied at the campus check-in station. Disinfected pens are used by each employee upon entering campus, to complete sign-in verification. Once used, pens are treated with Clorox germicidal wipes and not available until the prescribed length of contact time has lapsed. Where there must be sharing, the items will be disinfected between uses by employees using disinfectant wipes or spray which are provided by the school.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- There are handwashing facilities equipped with soap and warm water in restrooms throughout campus.
- Essential employees on campus use designated facilities and both day and evening cleaning crews follow deep cleaning protocols.
- Employees are encouraged and allowed to handwash at any time.
- We provided employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Employees are encouraged to wash their hands for at least 20 seconds each time. Signage is posted in every bathroom on 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:

- Offered COVID-19 testing at no cost during their working hours.
- The information below, on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases will be provided to them.

System for Communicating

Our goal is to ensure we have effective two-way communication with our employees, in a form they can readily understand, and includes the following information:

- Employees should report COVID-19 symptoms and possible hazards to any member of the COVID Team or the director of their department, by phone or email.
- Employees can report symptoms and hazards without fear of reprisal.
- To the extent feasible, our procedures or policies accommodate employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- To obtain voluntary COVID-19 testing, employees may use group or individual health coverage or any local testing center. As essential workers, under current guidelines, there should be no cost to employees. This type of voluntary testing does not have to be provided by the school but the school encourages employees get tested when they have symptoms, to safeguard their health and to reduce the likelihood of bringing the virus to campus.
- In the event the school is required to provide testing because of a campus 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. If the school is required to provide testing because of an employee exposure, a plan for how this will be accomplished at no cost to the employee during working hours, including when the testing is in response to CCR Title 8 section 3205.1, Multiple COVID-19 Infections and COVID-19 Outbreaks, as well as section 3205.2, Major COVID-19 Outbreaks, will be provided.
- 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.

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 campus until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from campus 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 if available, and/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 on campus 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 on campus 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, 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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School administrator formally approving the program:

<i>HEAD OF SCHOOL</i>		<i>JAMES E. PICKETT</i>	<i>1 MAR 2021</i>
Title	Signature	Name	Date

Appendix B: COVID-19 Inspections

In order to undertake inspections, please review the information available at www.dir.ca.gov/dosh/coronavirus/ for additional guidance on what to regularly inspect, including issues that may be specific to campus.

Date: _____

Name of person conducting the inspection: _____

Work location evaluated: _____

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

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: _____

Name of person conducting the investigation: _____

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

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):

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

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

Appendix D: COVID-19 Training Roster

Date: _____

Person that conducted the training: _____

Employee Name	Signature

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

This section will need to be added to our CPP if the campus is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases on campus within a 14-day period. Reference section 3205.1 for details.

This section of CPP will stay in effect until there are no new COVID-19 cases detected on campus for a 14-day period.

COVID-19 testing

- We will provide COVID-19 testing to all employees on campus 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 exposed on campus 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 on campus at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected on campus 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 campus 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.
- Other applicable controls of which we become aware.

Notifications to the local health department

- Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases on campus, we will contact the local health department for guidance on preventing the further spread of COVID-19 on campus.
- 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 school, 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.

Additional Consideration #2

Major COVID-19 Outbreaks

This section will need to be added to our CPP if the campus experiences 20 or more COVID-19 cases within a 30-day period. Reference section 3205.2 for details.

This section of CPP will stay in effect until there are no new COVID-19 cases detected on campus for a 14-day period.

COVID-19 testing

We will provide twice a week COVID-19 testing, or more frequently if recommended by the local health department, to all employees present on campus during the relevant 30-day period(s) and who remain on campus. COVID-19 testing will be provided at no cost to employees during employees' working hours.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees with COVID-19 exposure are excluded from campus in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria**, and any relevant local health department orders.

Investigation of workplace COVID-19 illnesses

We will comply with the requirements of our CPP **Investigating and Responding to COVID-19 Cases**.

COVID-19 hazard correction

In addition to the requirements of our CPP **Correction of COVID-19 Hazards**, we will take the following actions:

- In buildings or structures with mechanical ventilation, we will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, we will use filters with the highest compatible filtering efficiency. We will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems would reduce the risk of transmission and implement their use to the degree feasible.
- We will determine the need for a respiratory protection program or changes to an existing respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- We will evaluate whether to halt some or all operations on campus until COVID-19 hazards have been corrected
- Implement any other control measures deemed necessary by Cal/OSHA.

Notifications to the local health department

We will comply with the requirements of our Multiple COVID-19 Infections and COVID-19 Outbreaks-Notifications to the Local Health Department.