

COVID-19 Prevention Program (CPP): Crossroads Christian School

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

Date: 01/29/2021

Authority and Responsibility

Joleen Smith 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 are encouraged to participate in the identification and evaluation of COVID-19 hazards by: Reporting and identifying any hazardous situation to their supervisor or safety officer and appropriate actions will be taken.

Employee screening

We screen our employees by:

- Requiring a daily online self-assessment prior to arriving onto campus through a program called HSI DoneSafe.
- Upon arrival we take their temperature and require testing (50% of staff will be tested monthly where 100% of staff will be tested every 2 months)

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:

Upon notification of the identified Covid-19 hazard the onsite safety officer will assess and correct accordingly. If the situation requires additional assistance the safety officer will request assistance from our onsite maintenance and custodial staff. All requests will be documented and managed through a program called FMX to ensure timely correction and follow up measures are taken.

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:

- CCS will operate as a “closed campus” by restricting access of non-essential visitors, volunteers and group activities during regular hours of operation.
- Remote work arrangements are available for:
 - Specific roles identified for work that can be performed remotely
 - Staff members as necessary due to the need to stay home due to exposure or infection or other reasons approved
- We have installed visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- We have installed barrier devices (Plexi-glass) and established limited seating in specific work areas and break rooms
- We have implemented staggered arrival, departure, work, and break times.
- 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 face shields to employees and we will ensure the face covering 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.

We provide cleaning supplies to employees to use. They are responsible for cleaning their face coverings and shields as needed. We require that everyone on campus wears a face covering. If an employee encounters a non-employee not wearing a face covering, we will provide them with a face covering.

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.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

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: Plexi glass, closed campus, work areas assessed to make sure that shared work spaces will allow for maximum separation at least 6 feet apart.

We are ensuring that all indoor spaces (in all school classrooms, offices, etc) have sufficient ventilation through regular maintenance per American Society of Heating, Refrigerating, and Air Conditioning Engineers (ASHRAE) guidance on ventilation.

All HVAC systems are operated in occupied mode for a minimum period of 2 hours prior to

occupants entering the building.

We ensure proper ventilation during cleaning and disinfecting and introduce clean air by opening windows where practicable.

We have disabled any demand control ventilation and introduced the maximum possible OA flow 24/7 until further notice.

We encourage classrooms to open windows and doors, however if opening windows poses safety or health risk (e.g., by allowing pollen in or exacerbating asthma symptoms) to persons in the facility, we will consider alternatives. Maximize central air filtration for HVAC systems by using filters with a minimum efficiency reporting value (MERV) of at least 13.

Cleaning and Disinfecting

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

- Cleaning, disinfection, and ventilation of school campuses will follow guidelines developed by the CDPH.
- Campus is cleaned and disinfected daily.
- Restrooms and playgrounds are cleaned and disinfected frequently throughout the day.
- Playground equipment will be regularly inspected and cleaned for student use. Protexus “fogging” machines will be used to disinfect playground equipment when used.
- Common touch surfaces will be cleaned regularly (e.g., counter tops, door handles, restrooms, student desks, student chairs, etc.). Anti-microbial film has been installed on every high traffic door handle and countertop.
- Physical barriers have been installed in front office areas where face-to-face interaction occurs. Physical barriers will be cleaned frequently throughout the day.
- Staff are provided with cleaning supplies and instructed to clean frequently touched surfaces at school daily.
 - Frequently touched surfaces in the school include, but are not limited to:
 - Sink handles
 - Door handles
 - Shared technology and supplies
 - Shared tables, desks, or chairs
 - Desks and tables considered shared items will be cleaned before the next group arrives.
 - Desks or chairs will be cleaned daily after use.

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

Custodial staff will be trained in proper cleaning and disinfection procedures. If a case has been identified, the spaces where the case spent a large proportion of their time will be closed for any use until disinfected. Disinfection will be done immediately or within 24 hours.

Shared tools, equipment and personal protective equipment (PPE)

PPE will not be shared, e.g., gloves, goggles and face shields.

Employees are prohibited from sharing work space items such as phones, headsets, desks, keyboards, writing materials, instruments and tools to the extent feasible. Where there must be sharing, the items will be disinfected between uses by the employee with provided cleaning supplies.

Hand sanitizing

To implement effective hand sanitizing procedures, we encourage and allow time for employees to wash their hands frequently for at least 20 seconds throughout the day. Hand sanitizing stations have been installed in every classroom and in every high traffic area. Instructions on how to wash your hands effectively are posted in every room and restroom that has a 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.

Investigating and Responding to COVID-19 Cases

This will be accomplished by using the **Appendix C: Investigating COVID-19 Cases** form.

Cases will be report to local public health office.

Employees who had potential COVID-19 exposure in our workplace will:

- Remains on home isolation until:
 - 72 hours has passed since recovery **Recovery is defined as: (must meet the following:)
 - Resolution of fever without the employee using fever-reducing medication AND
 - improvement in respiratory symptoms AND
 - At least 10 days have passed since their last positive test
 - HR will contact them to describe benefits and exclusions.
- Asymptomatic employee with laboratory confirmed Positive COVID-19 Test
 - Remains on home isolation until:
 - At least 10 days have passed since their first positive COVID-19 test, assuming they have not developed any symptoms since their positive test
 - If symptoms develop, follow protocol for symptomatic individuals
 - HR will contact them to describe benefits and exclusions.
 -

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 will report COVID-19 symptoms and possible hazards to the supervisor and onsite safety office as soon as symptoms start. (Modes of communication include email, direct message or phone call)
- Employees can report symptoms and hazards without fear of reprisal.
- Our procedures and policies accommodate employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- We require bi-monthly testing at no cost to the employee and we supply additional testing site options including testing through their health insurance plan. In the event 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 actions to be taken with a positive test.

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 10 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 benefits, FFCRA where permitted by law and not covered by workers' compensation and the option for remote work (if work duties allow remote work option). Employees will be provided this information by Human Resources.

Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the Riverside County Health Department and provide any related information requested.
- 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, 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

Dr. Joleen D. Smith

Approved By: _____

Name: Dr. Joleen D. Smith

Date: 02 / 01 / 2021

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:

Date:

Name(s) of employee and authorized employee representative that participated:

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

Appendix B: COVID-19 Inspections

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			
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			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			

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 be implemented if the organization is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in your workplace 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 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.

Additional Consideration #2

Major COVID-19 Outbreaks

This section will be implemented should we experience 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 in our workplace 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 at our exposed workplace during the relevant 30-day period(s) and who remain at the workplace. 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 the workplace 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 at our workplace 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**.

Signature Certificate

Document Ref.: EXXPV-B6JPO-IBGLU-JWBGE

Document signed by:



Dr. Joleen D. Smith

Verified E-mail:
jsmith@crossroadsschool.org

Dr. Joleen D. Smith

IP: 174.204.36.37

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