

# 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 PRIMANTI MONTESSORI ACADEMY

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

**Date: JANUARY 27, 2021**

## Authority and Responsibility

The Center Director 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.
- Evaluate existing cleaning and disinfecting protocols, including fogging schedules in all occupied areas in the facility to ensure compliance with our COVID-19 policies and procedures.
- Review implementation strategies to model and reinforce social and physical distancing and movement among individuals in the workplace and their subjects.

## Employee Participation

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

- Attending in-service training and workshops conducted periodically in the workplace.
- Keeping track of all prevention controls by logging hourly all actions implemented.

## Employee Screening

We screen our employees by having them self-screen according to CDPH guidelines.

- Ensure all employees wear face coverings throughout the duration of the work shift.
- Additional protection is encouraged by wearing face shields, gloves and protective aprons. All PPEs are provided for the employees.
- Daily temperature check using non-contact thermometers – upon entry to the workplace, during noon break, and before leaving the workplace after the shift.
- Logging daily by truthfully filling out the Daily Health Check questionnaire form.

## 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:

- Daily inspection of the workplace and identifying all health and safety hazards.
- Hazards are immediately reported and the building maintenance manager and representatives are informed for timely correction.
- Follow up measures are taken to ensure timely correction.

## Control of COVID-19 Hazards

### Physical Distancing

Where possible, we ensure at least six feet of physical distancing at all times in our workplace by:

- Reducing the number of persons in an area at one time, including visitors.
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Staggered arrival, departure, work, and break times.
- Adhere to the California Code of Regulations Section 3205(c)(6)  
<https://www.dir.ca.gov/title8/3205.html>:
  - (A) All employees shall be separated from other persons by at least six feet, except where an employer can demonstrate that six feet of separation is not possible, and except for momentary exposure while persons are in movement. Methods of physical distancing include: reducing the number of persons in an area at one time, including visitors; visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel; staggered arrival, departure, work, and break times; and adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.
  - (B) When it is not possible to maintain a distance of at least six feet, individuals shall be as far apart as possible.
- 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 face masks are provided for free and are available throughout the day for the employees to use or to replace damaged or worn face masks.
- Employees are allowed to wear their own face coverings as long as they adhere to the face masks requirements – i.e., using fresh, clean masks at all times, with no offending designs.
- Face masks are required for all visitors entering the workplace. Disposable face masks are provided to non-employees that are not wearing face coverings.
- Any individuals who refuse to wear face coverings are not allowed inside the workplace.

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:

- Maximize the use of outdoor environment, such as the patio and playground area to increase outdoor air ventilation.
- Install solid partitions, if deemed necessary.

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

- Opening doors and windows when weather condition and air quality allow.
- Having a regular cooling, heating, and air conditioning (HVAC) professionals to inspect the system
- Regular checking of ventilation system to maximize air circulation by cleaning the air ducts, and cleaning or replacing air filters.
- Ensure that restroom exhaust fans are functional and operating at full capacity.

### **Cleaning and Disinfecting**

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

- Disinfecting solution (hypochlorous acid), manufactured within the workplace is available for use at any time.
- Hypochlorous acid is EPA-approved List N disinfectant and is USDA-certified with no harmful byproducts, therefore it is completely harmless to skin, eyes, and lungs.
- Hourly cleaning and disinfecting schedule is implemented in the classrooms and offices.
- A mechanical fogging machine that dispenses the same disinfectant is used to disinfect all the classrooms and offices at noon, during closing, and during janitorial cleaning.

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

- Any incident of a positive COVID-19 case in the workplace, the affected area will be closed for two weeks and all close contacts will be quarantined and tested.
- The classroom or office space is thoroughly cleaned and all surfaces are disinfected during the period of closure and will be fogged three times a day.
- Doors and windows will be kept open for a certain period of time during the day to ensure circulation of fresh air.
- Classroom supplies, toys, fixtures, books, and teaching materials will be thoroughly disinfected either by washing, soaking, spraying or fogging.
- All employees are trained during the COVID-19 workshops and in-service days to facilitate cleaning, disinfecting and fogging the workplace.

### **Shared Tools, Equipment and Personal Protective Equipment (PPE)**

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

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by providing alcohol sanitizer and disinfecting solution and wipes that are readily accessible for use.

## Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Provide employees with an effective hand sanitizer that contains at least 60% alcohol, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Hand sanitizers are available in areas without access to water and soap, including the gate area and all offices.
- Encouraging employees to wash their hands for at least 20 seconds each time.
  - Provide sinks with water and soap in every classroom and areas utilized by employees and students.
  - Toilets for older students are also provided with individual sinks.
  - Employees are trained to constantly wash hands or sanitize as frequent as possible.
  - Students are educated and are constantly reminded to wash hands: upon arrival, after using the toilet, after recess, before and after any meals and any time in-between after touching materials and activities from the shelves and when transitioning from one activity to the next.

## 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.

- Adhere to the California Code of Regulations Section 3205(c)(E)
  1. We evaluate the need for personal protective equipment to prevent exposure to COVID-19 hazards, such as gloves, goggles, and face shields, and provide such personal protective equipment as needed.
  2. We evaluate the need for respiratory protection in accordance with section 5144 when the physical distancing requirements in subsection (c)(6) are not feasible or are not maintained.
  3. We provide and ensure use of face masks/respirators in accordance with section 5144 when deemed necessary by the Division through the Issuance of Order to Take Special Action, in accordance with title 8, section 332.3.
  4. We provide and ensure use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

## 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 case will be reported to the CDPH and adhere to the recommendations set forth.
- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to them.

## System for Communicating

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

- Who employees should report COVID-19 symptoms and possible hazards to, and how.  
All employees experiencing COVID-19- related symptoms report directly to the Center Director and are advised to immediately get tested for COVID-19 and to quarantine for 14 days. Employees may not return to work unless the 14 days quarantine is completed and all COVID-19 symptoms are cleared.

- That employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Where testing is not required, how employees can access COVID-19 testing:  
The employer provides all the employees with the resources to find testing sites that provide free service. Employees have options to get tested through their health plans. Employees who have had close contact with a COVID-19 positive individual are not immediately required to get tested if no COVID-19 symptoms are experienced. However, the individual should quarantine and during the quarantine period, if symptoms appear, COVID-19 testing will be 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.
- In the event of exposure within the workplace during working hours, employees will be required to get tested. The employer provides all the employees with the resources to find testing sites that provide free service. Employees have options to get tested through their health plans. All close contacts are traced and identified and are immediately informed to quarantine, observe for any developing COVID-19 symptoms and get tested when symptoms appear.
- In the event of multiple COVID-19 infections and COVID-19 Outbreaks in the workplace:  
When 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, employees who have been exposed will be traced and required to quarantine to observe for any symptoms, and eventually will need to get tested further on during the 14-day quarantine period.  
The workplace will be locked down to assure that there will be no further transmission within the workplace.
- 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 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 applying employer-provided employee sick leave benefits and payments from public sources or other means of maintaining earnings such as the CARES Act benefits.
- Providing employees at the time of exclusion with information on available benefits.

## Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use the **Appendix C: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

## Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
    - 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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*Hissanka Gunasekara*

February 16, 2021

Signed and Approved by: HISSANKA GUNASEKARA

Date







## Appendix B: COVID-19 Inspections

Date: \_\_\_\_\_

Name of person conducting the inspection: \_\_\_\_\_

Work location evaluated: \_\_\_\_\_

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

## 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:** \_\_\_\_\_

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

**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):**

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

\*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