



**CAL/OSHA COVID-19 PREVENTION
PROGRAM REQUIREMENTS
HOLY TRINITY SCHOOL
January 2021**

1. System for Communication:

- Holy Trinity School will ask employees to report Covid-19 symptoms, possible Covid-19 exposures, and possible Covid-19 hazards at the workplace. This will be done without fear of reprisal.
- Staff who are at a higher risk of severe illness will be offered options on an individual basis.
- Holy Trinity School will provide information about access to Covid-19 testing to employees. Staff with symptoms of Covid-19 will be encouraged to get a test through their health care provider or community testing site. Asymptomatic staff will be encouraged to receive regular Covid-19 tests once local testing capacity allows.
- All staff will be trained on how to apply the policies and procedures of *Holy Trinity's School Reopening Plan in Response to Covid-19* prior to the first official week of the new school year.
- All staff will also be provided with additional training or direction prior to the first official week of the new school year, and families will be provided educational materials in the following safety actions:
 - Enhanced sanitation practices
 - Physical distancing guidelines and their importance
 - Screening procedures and how Covid-19 is spread
 - Covid-19 specific symptom identification and preventing the spread of Covid-19
 - Proper use, removal, and washing of face coverings

2. Identification and Evaluation of Covid-19 Hazards:

- Employees can participate in the identification and evaluation of Covid-19 hazards.
- Holy Trinity School will implement screening and other procedures for all staff entering the facility.
- All staff will answer the questions stated below regarding Covid-19 Symptoms before arriving on campus. Staff will have their temperature taken upon arrival.
- Staff members who answer yes to any of the questions below will stay home and monitor their health.
 - Do you have a new cough, nasal congestion, or runny nose?
 - Are you experiencing shortness of breath or difficulty breathing?
 - Are you having new muscle pain, body aches or fatigue?
 - Do you have a headache (that is not normal for you)? Do you have a sore throat?
 - Are you experiencing a new loss of taste or smell?
 - Are you experiencing nausea, vomiting, abdominal pain, or diarrhea?
 - Do you have a new rash or chills?
 - Have you been exposed to anyone who has been tested positive for COVID-19 in the last two weeks?
- Holy Trinity School will notify local health officials, staff, and all families immediately of any positive case of Covid-19 while maintaining confidentiality as required by state and federal laws.

- Holy Trinity School reviews guidance and orders from the State of CA and local health departments related to Covid-19 hazards and prevention on a regular basis.
- Holy Trinity School will close off areas used by any sick person and those areas will not be used before cleaning and disinfection. Places and times when people may have congregated or come in contact with one another will be identified. Areas and equipment/materials used that could have potentially exposed employees to Covid-19 hazards will also be identified.
- An evaluation of the employee's potential workplace exposure to anyone who entered the workplace will also be conducted.
- Air purifiers have been purchased for each classroom.
- Due to Holy Trinity School's commitment to providing a safe educational experience for all stakeholders, Holy Trinity School will continue all prevention strategies as needed and will take measures necessary to control transmission of the disease.

3. Investigating and Responding to Covid-19 Cases in the Workplace:

- When a Covid-19 case is reported, administration will determine the day and time the Covid-19 case was last present and to the extent possible, the date of the positive test and the date the Covid-19 case first had one or more symptoms, if any were experienced.
- Administration will also determine who may have had Covid-19 exposure. This will require an evaluation of activities of the Covid-19 case and all locations at the workplace which may have been visited by the Covid-19 case during the high-risk exposure period.
- Administration will give notice within one business day to all employees who may have been exposed. This would include any independent contractors or parish employees present at the workplace.
- Covid-19 testing will be offered at no cost to employees during their working hours at public county testing sites.
- An investigation of potential workplace conditions that may have contributed to the Covid-19 exposure will be conducted by administration.
- Personal identifying information and medical records will be kept confidential.

4. Correction of Covid-19 Hazards:

- Administration will implement effective policies and/or procedures for correcting unsafe or unhealthy conditions, work practices, policies, and procedures in a timely manner.

5. Training and Instruction:

- Holy Trinity School shall provide effective training and instruction to employees that includes the following:
- Holy Trinity School's 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. This includes any benefits available under workers' compensation law, the federal Families First Coronavirus Response Act, Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, local governmental requirements, the employer's own leave policies, and leave guaranteed by contract.

- Employees will be informed that Covid-19 is an infectious disease that can be spread through the air when an infectious person talks or vocalizes, sneezes, coughs, or exhales; that Covid-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth, although that is less common; and that 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 will be stressed to employees.
- Employees will be educated on 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.
- Employees will be educated on 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.
- Employees will be educated on the proper use of face coverings and the fact that face coverings are not respiratory protective equipment.
- The importance of not coming to work and obtaining a Covid-19 test if the employee has Covid-19 symptoms will be stressed often.

6. Physical Distancing:

- All employees shall be separated from other persons by at least six feet, except where Holy Trinity School administration can demonstrate that six feet of separation is not possible, and except for momentary exposure while persons are in movement. Methods of physical distancing might include telework or other remote work arrangements; 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.
- When it is not possible to maintain a distance of at least six feet, individuals shall be as far apart as possible.

7. Face Coverings:

- Holy Trinity School will provide face coverings and ensure they are worn by employees over the nose and mouth when indoors, when outdoors and less than six feet away from another person, and where required by orders from the CDPH or local health department. Holy Trinity School shall ensure face coverings are clean and undamaged. Holy Trinity School enforces the fact that face shields are not a replacement for face coverings, although they may be worn together for additional protection.
- Employees shall be informed of the following exceptions to the face coverings requirement:
 - 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 wearing respiratory protection in accordance with section 5144 or other title 8 safety orders.
 - 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.

- o Specific tasks which cannot feasibly be performed with a face covering. This exception is limited to the time in which such tasks are actually being performed, and the unmasked employee shall be at least six feet away from all other persons unless unmasked employees are tested at least twice weekly for Covid-19.
- o Employees exempted from wearing face coverings due to a medical condition, mental health condition, or disability shall wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits it.
- o Any employee not wearing a face covering, face shield, 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. Employers may not use Covid-19 testing as an alternative to face coverings when face coverings are otherwise required by this section.
- o Holy Trinity School will not prevent any employee from wearing a face covering when not required by this section, unless it would create a safety hazard, such as interfering with the safe operation of equipment.
- Holy Trinity School has measures to communicate to non-employees the face coverings requirements on their premises.
- Holy Trinity School has developed Covid-19 policies and procedures to minimize employee exposure to Covid-19 hazards originating from any person not wearing a face covering, including a member of the public.

8. Other Engineering Controls, Administrative Controls, and Personal Protective Equipment:

- Holy Trinity School has implemented cleaning and disinfecting procedures which include identifying and regularly cleaning and disinfecting frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, bathroom surfaces, and steering wheels. Holy Trinity School has informed employees of cleaning and disinfection protocols, including the planned frequency and scope of regular cleaning and disinfection.
- Holy Trinity School prohibits the sharing of personal protective equipment and to the extent feasible, items that employees come in regular physical contact with such as phones, headsets, desks, keyboards, writing materials, instruments, and tools. When it is not feasible to prevent sharing, sharing shall be minimized, and such items and equipment shall be disinfected between uses by different people. Sharing of vehicles shall be minimized to the extent feasible, and high touch points (steering wheel, door handles, seat belt buckles, armrests, shifter, etc.) shall be disinfected between users.
- Cleaning and disinfection of areas, material, and equipment used by a Covid-19 case during the high-risk exposure period will take place as needed.
- To protect employees from Covid-19 hazards, Holy Trinity School shall evaluate its handwashing facilities, determine the need for additional facilities, encourage and allow time for employee handwashing, and provide employees with an effective hand sanitizer.
- Holy Trinity School shall encourage employees to wash their hands for at least 20 seconds each time. Provision or use of hand sanitizers with methyl alcohol is prohibited.

- Holy Trinity School shall 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.

9. Reporting, Recordkeeping, and Access:

- Holy Trinity School shall report information about Covid-19 cases at the workplace to the local health department whenever required by law and shall provide any related information requested by the local health department.
- Holy Trinity School shall report immediately any Covid-19-related serious illnesses or death of an employee occurring in a place of employment or in connection with any employment.
- Holy Trinity School shall maintain records of the steps taken to implement the written Covid-19 Prevention Program.
- The written Covid-19 Prevention Program shall be made available at the workplace to employees.
- Holy Trinity School shall keep a record of and track all Covid-19 cases with the employee's name, contact information, occupation, location where the employee worked, the date of the last day at the workplace, and the date of a positive Covid-19 test. Medical information shall be kept confidential. The information shall be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

10. Exclusion of Covid-19 Cases:

- Holy Trinity School shall ensure that Covid-19 cases are excluded from the workplace until the return-to-work requirements are met.
- Holy Trinity School shall exclude employees with Covid-19 exposure from the workplace for 14 days after the last known Covid-19 exposure to a Covid-19 case.
- For employees excluded from work and otherwise able and available to work, Holy Trinity School shall continue and maintain an employee's earnings, seniority, and all other employee rights and benefits, including the employee's right to their former job status, as if the employee had not been removed from their job.
- Holy Trinity School may use employer-provided employee sick leave benefits for this purpose and consider benefit payments from public sources in determining how to maintain earnings, rights, and benefits, where permitted by law and when not covered by workers' compensation.

11. Return to Work Criteria:

- Covid-19 cases with Covid-19 symptoms shall not return to work until 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; and at least 10 days have passed since Covid-19 symptoms first appeared.
- Covid-19 cases who tested positive but never developed Covid-19 symptoms shall 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 shall 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 shall 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 shall be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.
- If there are no violations of local or state health officer orders for isolation or quarantine, Holy Trinity School may, upon request, allow employees to return to work on the basis that the removal of an employee would create undue risk to a community's health and safety. In such cases, Holy Trinity School shall develop, implement, and maintain effective control measures to prevent transmission in the workplace including providing isolation for the employee at the workplace and, if isolation is not possible, the use of respiratory protection in the workplace.

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