

COVID-19 Prevention Program (CPP)

Modesto Christian School's COVID-19 Prevention Program (CPP) is designed to control exposures to the SARS-CoV-2 virus that may occur on our campus.

Date: 25 January 2021

Authority and Responsibility

Cynthia A. Jewell, Vicki Ollson, Greg Pearce, Robb Spencer, and their designees, have overall authority and responsibility for implementing the provisions of this CPP in our workplace and for ensuring employees receive answers to questions about the program in a language they understand. In addition, all employees are responsible for implementing and maintaining the CPP in their assigned work areas

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

The following is implemented 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.
- Complete the Appendix C: COVID-19 Investigating COVID-19 Cases Form as needed to gather information and track possible exposure and positive COVID-19 cases.
- Complete the **Appendix D: Training Session Roster** Form to document participants in required training sessions.

Employee Participation

Employees are required to participate in the identification and evaluation of COVID-19 hazards as stated in the Modesto Christian School Employee Handbook, Amended section. Employees are to report any hazards to the COVID-19 Response Director, Lisa Medina, herein referred to as Response Director.

Employee Screening

Employees are screened by using the Daily Health Screening App and Daily Health Screening written form. The Response Director monitors all student and employee submissions via the App or form as the first task each morning. The Daily Health Screening Form focuses on the following COVID-19 symptoms: fever over 100.4 degrees, cough, sore throat, congestion or runny nose, trouble breathing or shortness of breath, loss of taste or smell, nausea, vomiting or diarrhea, headache or body aches, and if the individual has had contact with anyone exhibiting symptoms or diagnosed with COVID-19 within the last 14 days. Non-contact thermometers are used for those completing the form. While visitors to the campus are discouraged, in the event there is a visitor remaining on campus for an extended period of time, he/she is required to abide by this procedure.

The MCS Covid-19 Safety Plan (CSP) includes directives for all screeners and employees to abide by COVID-19 approved guidelines for the safety and health for all. This includes mask wearing, hand hygiene, social distancing and Daily Health Screening App or Daily Health Screening 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:

All hazardous work conditions will be evaluated according to the severity of the hazard and the time frame of completion. Each hazardous work condition will be assigned to the Director of Facilities, Robb Spencer, and the Response Director for oversight and monitoring of completion in a timely manner.

Control of COVID-19 Hazards

Transportation

Bus drivers will practice all safety guidelines and cleaning protocols as indicated for other staff. Bus capacity will be limited to allow for social distancing and students will be required to wear masks, practice hand hygiene, and show Daily Health Screening Form to driver before entering the bus.

Physical Distancing

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

- Employees may telework or other remote work arrangements, in the event MCS goes to Distance Learning.
- Reducing the number of persons in an area at one time, including visitors.
- Adhering visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Scheduling meetings via Zoom when 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

MCS provides clean, undamaged face coverings upon request 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. Face coverings and following other COVID-19 safety guidelines is required of all employees. Safety guidelines include:

- Face coverings are available upon request.
- To report an employee not in compliance with face coverings, the individual may confidentially report this information to the Response Director.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

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

MCS implements the following measures for situations where we cannot maintain at least six feet between individuals including installing solid partitions in the EL and MS/HS main offices.

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

- Circumstances where the amount of outside air needs to be minimized due to other hazards, such as heat and wildfire smoke.
- MCS checks air quality on a daily basis and flags are flown according to the recommendation.
- The ventilation system is properly maintained and adjusted in our school owned buildings.
- Ventilation systems include UV Light System installed in each HVAC unit.
- A new HVAC system was installed in the A building to address proper ventilation and proper air quality.

Cleaning and Disinfecting

MCS implements the following cleaning and disinfection measures for frequently touched surfaces:

- Ensuring adequate supplies and adequate time for it to be done properly.
- All classrooms are equipped with hand sanitizer, sanitizing wipes for cleaning high touch areas including desks, chairs, door handles, etc.
- Informing the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection.
- MCS ensures the cleanliness of the campus by using a GenEon mister/sprayer in all classrooms.

- Employees received specific training in using the GenEon system effectively and in accordance with the manufacturer's guidelines.
- A regular cleaning schedule is followed throughout the day with emphasis on high touch areas including door handles, tables, desks, light switches, sink handles, bathroom surfaces, chairs, etc.
- All cleaning materials utilized are approved for use against COVID-19 on the EPA approved list and are used in accordance with the directions on the label and kept away from students.

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

- Employees with a confirmed COVID-19 case will be asked to isolate away from campus.
- Employees are to complete the COVID-19\Suspected COVID-19 Case Form.pdf
- MCS will conduct an internal investigation to determine with whom the individual had been in close contact and to determine if any work-related factors could have contributed to risk of infection (and determine at that time any follow-up in addition to the steps below) while simultaneously doing a thorough "deep cleaning" of any identified area(s) on campus. Our cleaning procedures will follow all CDC guidelines.
- MCS has a designated Response Director who will contact the Stanislaus County Health Department (and follow their directives).
- MCS will provide timely communication with families with whom the ill individual has been in contact, while maintaining privacy requirements per FERPA and HIPAA, specifically 34 CFR § 99.3.

Hand Sanitizing

In order to implement effective hand sanitizing procedures, we:

- Encourage and allow time for employee handwashing.
- Additional employee restroom was installed in August 2021 to ensure adequate wash stations are available.
- Employees are issued personal bottles of hand sanitizer and prohibit hand sanitizers that contain methanol.
- Employees are encouraged to use hand sanitizer when entering and exiting buildings, in addition to as often as possible.

Personal Protective Equipment (PPE) to Control Employees' Exposure to COVID-19

MCS evaluated the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, and we provide such PPE as needed.

For indoor locations, MCS evaluated how to maximize the quantity of outdoor air and increased filtration efficiency to the highest level compatible with the existing ventilation system. We installed UV Light System in each HVAC system to increase filtration efficiency.

MCS provides and ensures 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:

- Immediately notified the Response Director and instructed to self-monitor for symptoms.
- Instructed to self-quarantine for 10 days if symptoms develop.
- Directed to seek testing within 3-5 days of exposure or upon development of symptoms.
- Directed to free testing site or will be reimbursed for insurance co-pay at their selected provider.
- For Training and Instruction details see below.
- For COVID-19 time-off benefits see HR Department.

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 report COVID-19 symptoms and possible hazards to the Response Director.
 The Response Director informs Director of Facilities and other administration, as deemed necessary.
- Employees may report symptoms and hazards without fear of reprisal. The Response Director is considered a confidential Administrative Assistant and will share this information with Administration only was necessary or upon request.
- MCS procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness is two-fold. The Director keeps this employee informed of COVID-19 increased trending on campus and then the employee is given the option to teach in the Distance Learning Program.
- While testing is not required, it is highly encouraged that employees access COVID-19 testing, if desired. Testing options are included in the MCS COVID-19 Prevention Plan and are available for employees to obtain voluntary testing through the county offered services and through health plans or local testing centers. The purpose is to give employees the tools to get tested when they have symptoms to reduce the likelihood of bringing the virus to work.
- 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. Several employees' access school provided insurance and are able to test through the medical insurance carrier. We also provide testing locations in the surrounding community.
- MCS takes measures to limit the time visitors and delivery personnel are on our campus in an effort to minimize possible COVID-19 hazards employees from entering our campus. All entering the campus are required to observe COVID-19 guidelines and we limit their contact with employees to ensure the safety and well-being for all.
- Employees are informed in the event there is a COVID-19 positive diagnosis within a timely manner and usually within hours of the Response Director's knowledge of this information.

Training and Instruction

MCS provides effective training and instruction that includes:

- Reviewing COVID-19 policies and procedures to protect employees from COVID-19 hazards on a regular basis.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.

• GenEON training for proper use of equipment.

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 is used to document training and instruction.

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 employer-provided employee sick leave benefits,
 payments from public sources 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 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.
- 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 exposure or positive cases. The information will be made available to employees, or as otherwise required by law, with personal identifying information removed.
- Consult with the School Board President and medical doctor, Dr. Glen Villanueva, as COVID-19 issues arise.

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.

Cynthia A. Jewell

Cynthia A. Jewell
Interim Superintendent/Principal HS

25 January 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 consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

Person conducting the evaluation: [enter name(s)]

Date: [enter date]

Name(s) of employee and authorized employee representative that participated: [enter name(s)]

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

[This form is only intended to get you started. Review the information available at www.dir.ca.gov/dosh/coronavirus/ for additional guidance on what to regularly inspect for, including issues that may be more pertinent to your particular type of workplace. You will need to modify form accordingly.]

Date:

Name of person conducting the inspection:

Work location evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions	Installed in main offices in high contact areas		Fall 2020
Ventilation (amount of fresh air and filtration maximized)	Repairs to existing HVAC systems or installed new systems.	Robb Spencer	Fall 2020
Additional room air filtration	UV Light System installed		Fall 2020
Administrative			
Physical distancing	Monitored throughout the day		
Surface cleaning and disinfection (frequently enough and adequate supplies)	Monitored throughout the day		
Hand washing facilities (adequate numbers and supplies)	Supplies monitored throughout the day		
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions	Monitored throughout the day		
PPE (not shared, available and being worn)	Monitored throughout the day		
Face coverings (cleaned sufficiently often)	Monitored throughout the day		

Gloves	Available	
Face shields/goggles	Monitored throughout the day	
Respiratory protection	Upon request	

Appendix C: Investigating COVID-19 Cases

All MCS 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 un-redacted 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) Un-redacted 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 ar 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 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):	

Appendix D: COVID-19 Training Roster

Complete the Training Session Roster form to document employee participation.

Title of Training Session:

Date:

	Employee Name	Employee Signature
1		
2		
3		
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