



CONCORDIA CHRISTIAN SCHOOL

16603 San Fernando Mission Blvd, Granada Hills, CA 91344 – 818.368.0892

COVID-19 Prevention Program (CPP) for Concordia Christian School

Dated: February 1, 2021

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

We are and will continue complying with all the protocols and procedures based on the waiver application, Appendix T1, Appendix T2 and our Preschool and K-8th Protocols.

Authority and Responsibility

Concordia Christian School Principal, Katherine Moore, has overall authority and responsibility for implementing the provisions of this CPP. In addition, the COVID-19 Compliance Team is responsible for implementing and maintaining the CPP in their assigned areas and for ensuring employees receive easily understandable answers to questions about the program.

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 implement the following at our school:

- Conduct site evaluations and inspections by identifying the interaction, area, activity, task, process, equipment and material that potentially exposes employees to COVID-19 hazards; determining the places and times when the hazard was present or occurred; determining the potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers; identifying existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation.
- The COVID-19 Compliance Team regularly conducts evaluations and inspections with direct input from staff, and responds to any concerns identified with additional PPE, enhanced social distancing procedures including shifting to larger or outdoor spaces.
- Evaluate staff's potential site exposures to all persons at, or who may enter our school.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the Los Angeles County Department of Public Health (LACDPH) related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls at our site and the need for different or additional controls.
- Conduct periodic inspections as needed to identify unhealthy conditions, practices, and procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures in the following areas:
 - 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;

- Personal Protective Equipment (not shared, available and being worn): face coverings, gloves, and face shields.

Employee Participation

Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

- Reporting any COVID-19 hazards or concerns to the COVID-19 Compliance Team. All COVID-19 reported hazards are addressed on a case by case basis to resolve the issue.

Employee Screening

We screen our employees by:

- Providing an online self-wellness check for all school personnel to complete prior to or upon arriving at the school site.
- Substitutes are screened by school staff before entering the campus.

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures reported to the COVID-19 Compliance Team are reviewed and corrected in a timely manner based on the severity of the hazards, as follows:

- The school site was reviewed to ensure healthy and safe environments through a risk assessment conducted prior to reopening in December 2020.
- The COVID-19 Compliance Team is responsible for reporting any changes in physical conditions that would negatively impact the health and safety of students and staff and taking corrective action.
- The severity of the hazard will be assessed and corrective action prioritized.
- Individuals are identified as responsible and follow up measures are taken for timely correction.

Control of COVID-19 Hazards

Physical Distancing

Where possible, we ensure at least six feet of physical distancing at all times on site by:

- Providing guidance and promoting physical distancing on the school site.
- Posting signage to promote social distancing.
- Adjusting processes or procedures, such as utilizing Zoom or Google Meet as an alternative to in-person meetings when necessary, and allowing greater distance between staff and students.
- Prohibiting the gathering of students or staff and requiring social distancing at staff meetings.
- Limiting access to office to reduce the number of people in one area at one time, including visitors.
- Offering remote work arrangements for staff.
- Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

Face Coverings

Face coverings are made available to staff and students and we ensure they are properly worn 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 LACDPH. All non-employees are required to wear a face covering on school campus.

The following are exceptions to the use of face coverings at our school:

- When an employee is alone in a room.
- While eating and drinking, provided staff is 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 be feasibly performed with a face covering, where staff will be kept at least six feet apart.

Engineering Controls

We implement the following measures for situations where we cannot maintain at least six feet between individuals:

- Temporary shields have been installed in classrooms and office spaces to enhance the distance between individuals.
- School specific schedules and plans provide ingress and egress school day pathways to minimize contact at the school site.
- Where student enrollment or physical space will not allow 6 feet of distancing, the COVID-19 Compliance Team will consider options to achieve 6 feet of distancing including shifting to outside or other available spaces.
- Additional personal protective equipment is available to all employees including face coverings, face shields, gloves, and approved cleaning supplies to provide additional protection.

We maximize, to the extent feasible, the quantity of outside air with mechanical or natural ventilations systems by:

- Maximizing air flow in occupied spaces with functioning AC and new AC filters installed.
- Providing air purifiers in the classrooms.

Cleaning and Disinfecting

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

- Providing adequate supplies, staffing, and time to clean/disinfect surfaces during daily routines.
- Informing employees of the cleaning and disinfecting schedule, protocols, and supplies to be used.
- Training cleaning staff on the safe and correct application of approved disinfectant.
- Providing additional cleaning/disinfecting supplies to staff to use on an as needed basis such as cleaning/disinfecting wipes.

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

- Close access to the location/area where the positive COVID-19 case spent significant time until the area(s) are cleaned and disinfected.
- Provide PPE to those responsible for cleaning the area(s) including gloves, face shields, and KN95 face masks.

Shared Tools, Equipment and Personal Protective Equipment (PPE)

- PPE including, but not limited to, face masks, face shields, and gloves are not shared between employees.
- Items that employees come in regular physical contact with, such as phones, desks, keyboards, writing materials, instruments and tools are not shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by staff utilizing approved cleaning/disinfecting supplies.

Hand Sanitizing

In order to implement effective hand sanitizing procedures, we:

- Evaluated available hand washing facilities and determined there was no need at this time for additional facilities.
- Encourage and allow time for employee handwashing.
- Encourage employees to wash their hands for at least 20 seconds each time.
- Provide employees with an effective hand sanitizer, and prohibiting hand sanitizers that contain methanol (i.e. methyl alcohol).

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

- We evaluate the need for PPE (such as gloves, face coverings, and face shields) as required by CCR Title 8, section 3380, and provide such PPE as needed.

Investigating and Responding to COVID-19 Cases

Our COVID-19 Compliance Team will investigate, respond, and track COVID-19 cases. The information is accessible to authorized school employees only.

Employees who had potential COVID-19 exposure at our school will be:

- Sent home immediately or directed to remain at home and not report to school and isolation guidelines will be provided.
- Contacted by the COVID-19 Compliance Team to: conduct contact tracing in accordance with LACDPH requirements; provide information on quarantine guidelines and return to work protocols.
- Employees are instructed to remain in quarantine and not return to school until the identified quarantine period is completed.

System for Communicating

Our goal is to ensure that we have an effective readily understandable communication with our employees that it includes the following information:

- Employees who will physically report to school conduct an online self-wellness check prior to or upon arriving at school. Employees answer questions to determine if they have been in close contact with a positive COVID-19 case or if they have any COVID-19 related symptoms. Employees are instructed to notify the COVID-19 Compliance Team if they have tested positive for COVID-19.
- Employees can report symptoms and hazards without fear of reprisal.

- Our procedures or policies for accommodating employees with medical or other conditions will be considered on a case by case basis.
- Employees are not required to be tested for COVID-19 but are provided with information on the locations and any documentation needed to access a COVID-19 test.
- In the event of a COVID-19 related exposure on the school campus, all impacted employees are provided with a notification informing them of the exposure, steps that can be taken to limit additional exposures, and any disruption that may result from the exposure.

Training and Instruction

Concordia provides effective training and instruction that includes:

- 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 school if the employee has COVID-19 symptoms.
- 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.
- Information is provided during staff meetings, through emails, and one-on-one communication, ensuring all staff members receive current updates.

Exclusion of COVID-19 Cases

When we have a COVID-19 case at our site, we will limit transmission by:

- Ensuring that COVID-19 cases are excluded from the site until our return-to-school 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.
- The Families First Coronavirus Response Act (FFCRA) emergency paid sick leave passed by the United States Congress in March, expired on December 31, 2020. It was not renewed in the latest COVID-19 stimulus legislation. As of January 1, 2021, there is no longer additional COVID-19 leave from federal or state emergency legislation. There is no additional requirement for schools to

provide COVID-19 leave and many will revert to the use of regular sick leave for COVID-19 issues. Concordia will observe the normal guidelines for federal and state family leave (FMLA and CFRA). Concordia employees will be able to use regular sick leave to care for family or household members who test positive for COVID-19 or who need to quarantine due to close contact with a positive COVID-19 person.

- Providing employees with information on available benefits.

Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our site to the LACDPH whenever required by law, 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.
- Concordia keeps a record of all COVID-19 cases. This information is made available to authorized employees, or for others with personal identifying information removed.
- 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 site to employees and representatives of Cal/OSHA upon request.
- Concordia provides our school community with ongoing communication of exposure and quarantine guidelines for both students and staff.

Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to site 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 their 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 LACDPH, 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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Additional Consideration #1 Multiple COVID-19 Infections and COVID-19 Outbreaks

This section applies if our school is identified by LACDPH as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in an exposed workplace within a 14-day period as detailed in section [3205.1](#).

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

COVID-19 Testing

- We will recommend COVID-19 testing for all exposed employees and provide locations of free testing sites.

Exclusion of COVID-19 Cases

We will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the site in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria** requirements, and LACDPH orders, if applicable.

Investigation of Workplace COVID-19 Illness

We will immediately investigate and determine possible site-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 COVID-19 hazards including:
 - Our leave policies and practices
 - Our COVID-19 testing recommendations
 - Outdoor air
 - Air filtration
 - Physical distancing
- Update in response to new information
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We will consider:
 - Moving indoor tasks outdoors as much as is possible and appropriate
 - Increasing outdoor air supply when indoors
 - Improving air filtration
 - Increasing physical distancing as much as possible

Notifications to the Los Angeles County Department of Public Health (LACDPH)

- Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases at our school, we will contact the LACDPH for guidance on preventing the further spread of COVID-19 within the site.
- We will submit to the LACDPH the information requested for the completion of the COVID-19 online Education Sector Form. We will continue to give notice to the LACDPH of any subsequent COVID-19 cases at our site.

Additional Consideration #2: Major COVID-19 Outbreaks

This section applies to any place of employment covered by section 3205 when there are 20 or more COVID19 cases in an exposed workplace within a 30-day period as detailed in [3205.2](#).

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

COVID-19 Testing

We will recommend COVID-19 testing as determined by the LACDPH for all employees present at our exposed workplace during the relevant 30-day period(s).

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 LACDPH 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 with AC and/or purifiers, we will consider replacing filters.
- We will evaluate whether to halt some or all operations at our site until COVID-19 hazards have been dealt with.
- Implement any other control measures deemed necessary by Cal/OSHA.

Notifications to the Los Angeles County Department of Public Health (LACDPH)

We will comply with the requirements of our **Multiple COVID-19 Infections** and **COVID-19 Outbreaks-Notifications to the LACDPH**.