



COVID-19 Safety Plan (CSP)

February 1, 2021

Overview

On January 14, 2021, the California Department of Public Health (CDPH) issued the *COVID-19 and Reopening In-Person Instruction Framework & Public Health Guidance for K-12 Schools in California, 2020-2021 School Year*:

https://www.cdph.ca.gov/Programs/CID/DCDC/CDPH%20Document%20Library/COVID-19/Consolidated_Schools_Guidance.pdf.

The consolidated framework states that schools that have already reopened for in-person instruction must, by February 1, 2021, complete and post a COVID-19 Safety Plan (CSP) to their website homepage. The COVID-19 Safety plan (CSP) consists of two parts which are included in this document:

- (1) the [Cal/OSHA COVID-19 Prevention Program \(CPP\)](#) and
- (2) the [COVID-19 School Guidance Checklist](#).

This document also includes a link to the School Reopening Plan:

<http://www.setonpalalto.org/wp-content/uploads/2021/02/FinalSeton-Reopening-Framework-2-1-2021.pdf>), which provides detailed information describing how the school will meet the requirements outlined in the COVID-19 Safety Plan (CSP).

Questions regarding a school's COVID-19 Safety Plan (CSP) should be directed to the school principal.

COVID-19 Prevention Program (CPP) for Diocese of San Jose

St. Elizabeth Seton School

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

Date: February 1, 2021

Authority and Responsibility

Ms. Evelyn Rosa 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 Risk Assessment form previously distributed and Attached as **Appendix A**.
- 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 speaking with their direct supervisor or principal or, if not comfortable doing so, with their pastor, Director of Human Resources, or Superintendent of Schools.

Employee screening

We screen our employees by following the School Reopening Plan previously distributed and accessible at the following link: <http://www.setonpaloalto.org/wp-content/uploads/2021/02/FinalSeton-Reopening-Framework-2-1-2021.pdf>

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.

Control of COVID-19 Hazards

Physical Distancing

Employees will follow the **School Reopening Plan**: <http://www.setonpaloalto.org/wp-content/uploads/2021/02/FinalSeton-Reopening-Framework-2-1-2021.pdf>

Face Coverings

Employees will follow the **School Reopening Plan**: <http://www.setonpaloalto.org/wp-content/uploads/2021/02/FinalSeton-Reopening-Framework-2-1-2021.pdf>

Cleaning and disinfecting

We implement the cleaning and disinfection measures as outlined in the **School Reopening Plan**: and **Notice of Disinfection and Safety Plan: Appendix C**.
<http://www.setonpaloalto.org/wp-content/uploads/2021/02/FinalSeton-Reopening-Framework-2-1-2021.pdf>

If there is a case of COVID-19 in the workplace, we will follow the cleaning requirements as outlined in the **Notice of Disinfection and Safety Plan: Appendix C**.

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 cleaned between uses as outlined in the **School Reopening Plan**: <http://www.setonpaloalto.org/wp-content/uploads/2021/02/FinalSeton-Reopening-Framework-2-1-2021.pdf>

Hand cleaning/sanitizing

In order to implement effective hand cleaning/sanitizing procedures, we follow the procedure outlined in the **School Reopening Plan**: <http://www.setonpaloalto.org/wp-content/uploads/2021/02/FinalSeton-Reopening-Framework-2-1-2021.pdf>

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 outlined in the **School Reopening Plan**: <http://www.setonpalalto.org/wp-content/uploads/2021/02/FinalSeton-Reopening-Framework-2-1-2021.pdf>

Investigating and Responding to COVID-19 Cases

This will be accomplished by using the protocols outlined by the Santa Clara County Public Health Department, detailed in the County [COVID-19 Designee Toolkit](#) and included in the School Reopening Plan.

All cases related to schools in the Diocese of San Jose are to be reported to the Department of Catholic Schools Operations Coordinator. Please call Joanne Miley at 408-983-0185 if you become aware of any COVID-19 exposure, positive test, or symptoms of COVID-19.

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:

- That employees should report COVID-19 symptoms and possible hazards to your supervisor or principal.
- 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.
- 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. If this were to happen, we will communicate with employees with close contacts or in the same workplace with a COVID-19 positive employee or visitor in writing using the notices required by the Santa Clara County Public Health Department. The template for these notices can be accessed through the County [COVID-19 Designee Toolkit](#).

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. We will provide this

information if there is an exposure in the workplace.

- 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 facecoverings.
- 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.
- We will use the CDC resources attached as Appendix D and will document the training using Appendix E.

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 it is demonstrated that the COVID-19 exposure is work related. Wages will be continued if the employee has sick leave, vacation time or other paid time off or if the person has filed a worker's compensation claim. If the latter, the amount of the salary continuation is determined by the workers compensation system.
- 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, and to representatives of Cal/OSHA immediately upon request.
- Use a log maintained by the school to keep a record of and track all COVID-19 cases. The information will be made available as 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 100.0 or higher has resolved without the use of fever-reducing medications.
 - COVID-19 symptoms have improved.
 - At least 10 days have passed since the date of specimen collection of their positive COVID-19 test.
 - 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 or quarantine was effective.
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Appendix A: Risk Assessment

COVID-19 RISK ASSESSMENT

For Employees:

- Does the workplace have personal protective equipment available? Including:
 - face masks
 - gloves
 - soap
 - hand sanitizer.

- Is there someone trained to take the temperature of employees who exhibit symptoms while on campus?
 - Is there a private place for this?
 - Does the workplace have sufficient no-contact thermometers?

- Is there sufficient space between the work areas to maintain safe distancing?
 - Private office?
 - Staggered work hours available?
 - Can employees continue to work at home?

- Does the workplace have disinfecting supplies that comply with the Cal-OSHA requirements?
 - Is your workplace following the EPA guidelines? <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>
 - Are you cleaning often enough?
 - Daily for all surfaces?
 - After each use for frequently used surfaces (e.g. copy machines, phones, door knobs)
 - Does your workplace have enough equipment so that employees do not have to share:
 - Phones
 - Computers
 - Work area

- Are your employees implementing individual controls to stop the spread of COVID-19?
 - Take their temperatures at home
 - Stay home if sick
 - Stay home if you have had close contact with someone with COVID-19

- Does your workplace have common areas?
 - If so, can you limit the number of employees who use it at one time?
 - Can you stagger lunch and breaks?

For Visitors:

- Does the reception area have safe distancing protocols?
 - Does your workplace have cues to stay six feet apart? (e.g. tape markers or dividers)
 - Does your workplace have a barrier between the employee and visitor that is either a physical barrier (window system or similar) or a cue (stay behind line)?

- Does the workplace have the ability to provide services contact-free?
 - Can you limit the amount of cash that is exchanged?
 - Can you limit interaction between employee and visitors so that items are placed on a counter and the employee can move back while the visitor approaches and takes the items?

- Do you have protocols for visitors?
 - Is there signage that informs visitors of needed precautions (e.g. distancing)?
 - Require face covering
 - Self-certify that visitors do not have COVID-19 symptoms or recent exposure
 - Redirect visitors to use the telephone or email system to contact the office if possible?

Appendix B: COVID-19 Inspections (Template)

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			
Respiratory protection			

Diocese of San Jose Notice of Disinfection and Safety Plan

California Labor Code 6409.6

In response to the COVID-19 pandemic the Diocese of San Jose adopted and implemented a disinfection and safety plan per the guidelines of the federal Centers for Disease Control. Now, in response to a potential COVID-19 exposure, we are providing the following information on the Diocese of San Jose's current disinfection and safety plan and new measures we are implementing.

1. Routine Cleaning: Employees will use EPA approved disinfectants to clean their work areas after each shift. Employees will leave enough time at the end of their shifts to complete the cleaning process. All such time is considered work time. When using shared equipment such as copiers, disinfect after each use. This link provides more guidance: <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>
2. When an employee, student or visitor gets sick at work, Cleaning and disinfecting requirements include:
 - Close any areas used by the person for a prolonged period of time (i.e. 15 minutes).
 - Wait 24 hours before cleaning and disinfecting to minimize potential for other employees being exposed to respiratory droplets.
 - During the waiting period, open doors and windows.
 - Use protocols that meet the EPA criteria see this <https://www.cdc.gov/coronavirus/2019-ncov/community/clean-disinfect/index.html> and this <https://www.epa.gov/newsreleases/epa-cdc-release-guidance-cleaning-and-disinfecting-spaces-where-americans-live-work> :
The person cleaning must wear gloves, facemask and gown.
3. If a person states that he/she was in your building and later tests positive or has symptoms, take the following steps:
 - If it has been fewer than 7 days since the sick person used the facility, clean and disinfect all areas used by the sick person.
 - If it has been 7 days or more since the sick employee used the facilities, additional cleaning is not necessary.
4. In other situations where the person tests positive but does not have any symptoms or has only a close contact with someone who is positive for COVID-19: Regular cleaning protocols can resume unless the person develops symptoms or becomes COVID-19 positive. In that case, follow applicable guidance above

Appendix D: Training Materials

1. Social Distancing Protocol (PDF) | [English](#) | [Chinese](#) | [Spanish](#) | [Vietnamese](#) |
2. Prevent the Spread of COVID-19 Poster (PDF): | [English](#) | [Chinese](#) | [Spanish](#) | [Vietnamese](#) |
3. Safe Breaks at Work (PDF): [English](#) | [Chinese](#) | [Spanish](#) | [Vietnamese](#) | [Tagalog](#) |
4. Do You Have These Symptoms? (PDF): [English](#) | [Chinese](#) | [Spanish](#) | [Vietnamese](#) |
5. To Enter This Building, You Must... (PDF): [English](#) | [Chinese](#) | [Spanish](#) | [Vietnamese](#) | [Tagalog](#) |
6. Traveler Quarantine Notice 8.5 x 11 (PDF) [English](#) | [Chinese](#) | [Spanish](#) | [Vietnamese](#) | [Tagalog](#) |

Multiple COVID-19 Infections and COVID-19 Outbreaks

[This section will need to be added to your CPP if your workplace 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.

COVID-19 School Guidance Checklist

January 14, 2021

CALIFORNIA
ALL

Your Actions
Save Lives



Date: 2/1/2021

2021 COVID-19 School Guidance Checklist

Name of Local Educational Agency or Equivalent: _____

Number of schools: _____

Enrollment: _____

Superintendent (or equivalent) Name: _____

Address: _____

Phone Number: _____

Email: _____

Date of proposed reopening: _____

County: _____

Grade Level (check all that apply)

Current Tier: _____

TK 2nd 5th 8th 11th

(please indicate Purple, Red, Orange or Yellow)

K 3rd 6th 9th 12th

1st 4th 7th 10th

Type of LEA: _____

This form and any applicable attachments should be posted publicly on the website of the local educational agency (or equivalent) prior to reopening or if an LEA or equivalent has already opened for in-person instruction. For those in the Purple Tier and not yet open, materials must additionally be submitted to your local health officer (LHO) and the State School Safety Team prior to reopening, per the [Guidance on Schools](#).

The email address for submission to the State School Safety for All Team for LEAs in Purple Tier is:

K12csp@cdph.ca.gov

LEAs or equivalent in Counties with a case rate $\geq 25/100,000$ individuals can submit materials but cannot re-open a school until the county is below 25 cases per 100,000 (adjusted rate) for 5 consecutive days.

For Local Educational Agencies (LEAs or equivalent) in ALL TIERS:

I, _____, post to the website of the local educational agency (or equivalent) the COVID Safety Plan, which consists of two elements: the **COVID-19 Prevention Program (CPP)**, pursuant to CalOSHA requirements, and this **CDPH COVID-19 Guidance Checklist** and accompanying documents,

which satisfies requirements for the safe reopening of schools per CDPH [Guidance on Schools](#). For those seeking to open while in the Purple Tier, these plans have also been submitted to the local health officer (LHO) and the State School Safety Team.

I confirm that reopening plan(s) address the following, consistent with guidance from the California Department of Public Health and the local health department:

Stable group structures (where applicable): How students and staff will be kept in stable groups with fixed membership that stay together for all activities (e.g., instruction, lunch, recess) and minimize/avoid contact with other groups or individuals who are not part of the stable group.

Please provide specific information regarding:

How many students and staff will be in each planned stable, group structure? (If planning more than one type of group, what is the minimum and maximum number of students and staff in the groups?)

If you have departmentalized classes, how will you organize staff and students in stable groups?

If you have electives, how will you prevent or minimize in-person contact for members of different stable groups?

Entrance, Egress, and Movement Within the School: How movement of students, staff, and parents will be managed to avoid close contact and/or mixing of cohorts.

Face Coverings and Other Essential Protective Gear: How CDPH's face covering requirements will be satisfied and enforced for staff and students.

Health Screenings for Students and Staff: How students and staff will be screened for symptoms of COVID-19 and how ill students or staff will be separated from others and sent home immediately.

Healthy Hygiene Practices: The availability of handwashing stations and hand sanitizer, and how their safe and appropriate use will be promoted and incorporated into routines for staff and students.

Identification and Tracing of Contacts: Actions that staff will take when there is a confirmed case. Confirm that the school(s) have designated staff persons to support contact tracing, such as creation and submission of lists of exposed students and staff to the local health department and notification of exposed persons. Each school must designate a person for the local health department to contact about COVID-19.

Physical Distancing: How space and routines will be arranged to allow for physical distancing of students and staff.

Please provide the planned maximum and minimum distance between students in classrooms.

Maximum: _____ feet

Minimum: _____ feet. If this is less than 6 feet, please explain why it is not possible to maintain a minimum of at least 6 feet.

Staff Training and Family Education: How staff will be trained and families will be educated on the application and enforcement of the plan.

Testing of Staff: How school officials will ensure that students and staff who have symptoms of COVID-19 or have been exposed to someone with COVID-19 will be rapidly tested and what instructions they will be given while waiting for test results. Below, please describe any planned periodic asymptomatic staff testing cadence.

Staff asymptomatic testing cadence. Please note if testing cadence will differ by tier:

Testing of Students: How school officials will ensure that students who have symptoms of COVID-19 or have been exposed to someone with COVID-19 will be rapidly tested and what instructions they will be given while waiting for test results. Below, please describe any planned periodic asymptomatic student testing cadence.

Planned student testing cadence. Please note if testing cadence will differ by tier:

Identification and Reporting of Cases: At all times, reporting of confirmed positive and suspected cases in students, staff and employees will be consistent with [Reporting Requirements](#).

Communication Plans: How the superintendent will communicate with students, staff, and parents about cases and exposures at the school, consistent with privacy requirements such as FERPA and HIPAA.

Consultation: (For schools not previously open) Please confirm consultation with the following groups

Labor Organization

Name of Organization(s) and Date(s) Consulted:

Name: _____

Date: _____

Parent and Community Organizations

Name of Organization(s) and Date(s) Consulted:

Name: _____

Date: _____

If no labor organization represents staff at the school, please describe the process for consultation with school staff:

For Local Educational Agencies (LEAs or equivalent) in PURPLE:

Local Health Officer Approval: The Local Health Officer, for (state County) _____. County has certified and approved the CSP on this date: _____. If more than 7 business days have passed since the submission without input from the LHO, the CSP shall be deemed approved.

Additional Resources:

[Guidance on Schools](#)

[Safe Schools for All Hub](#)

Note: This checklist was amended on January 29th to delete language regarding the need to submit this checklist to a County Office of Education. The CSP does not need to be submitted to the County Office of Education as part of the public health guidance, though the County Office of Education may request the CSP as part of other processes.