



## **CAL / OSHA COVID-19 Prevention Program (CPP) for**

### **The French American School of Silicon Valley**

**1522 Lewiston Drive, Sunnyvale, CA 94087**

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

**Date: April 27, 2021**

### **Authority and Responsibility**

**Pierre-Ludovic Perrot, Head of School** 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.

### **Employee participation**

Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by: **Reporting an issue to an employee's supervisor, Pierre-Ludovic Perrot, Head of School, or Laurel Maguire, Director of Finance and Operations**

### **Employee screening**

We screen our employees by: **Use of the Kyla App, with daily COVID-19 symptom monitoring and guidance; daily temperature screenings using touchless temperature scanning device combined with face recognition feature; monthly on-campus COVID-19 testing through Kyla.**

## 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:

**The severity of the hazard will be assessed, and correction time frames assigned, accordingly. Individuals are identified as being responsible 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:

- **Eliminating the need for all employees to be in the workplace – telework or other remote work arrangements, where possible**
- **Reducing the number of persons on campus, limiting persons on campus to students, staff and essential contractors.**
- **Visual cues such as signs and floor markings to indicate where students, staff and others should be located or their direction and path of travel.**
- **Staggered arrival, departure, recess, lunch, and break times.**

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. **Face coverings will be provided, and replaced, as needed.**

The following are exceptions to the use of face coverings in our workplace:

- While eating and drinking, provided employees are at least six feet apart and outside. No staff is allowed to eat inside the buildings.
- 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 emergency situations that cannot feasibly be performed with a face covering.

### Engineering controls

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

- **Classroom cohort models adhered to across all grades**
- **Plexiglass “installed” around teachers’ desks to remind students and to create an additional barrier**

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

- **Properly maintaining and adjusting the ventilation system, using MERV 13 Filters**
- **Installing Floor and Wall Air Purifiers in each classroom and office**
- **Doors and windows remaining open, to the extent possible.**

### Cleaning and disinfecting

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

- **Provide training to teachers, staff, and janitors in all COVID-19 cleaning and maintenance protocols.**
- **Janitorial and Front Office Staff clean and disinfect common areas throughout the day.**
- **Teachers and Staff clean and disinfect their classroom's frequently touched areas throughout the day.**
- **Janitorial staff thoroughly cleans and disinfects the campus nightly, using in addition UV light surface sanitizers and electrostatic sprayer.**

Should we have a COVID-19 case in our workplace, we will implement the following procedures: **as described in the School's Reopening Plan posted on the school's website: [www.fassv.org](http://www.fassv.org).**

### **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 **janitorial and front office staff. Staff members are also instructed to wipe down the common area with disinfectant wipes after each use.**

### **Hand sanitizing**

In order to implement effective hand sanitizing procedures, we:

- **Installed touchless faucets, touchless soap and paper towel dispensers in all classrooms and bathrooms**
- **Installed extra touchless handwashing stations on campus.**
- **Require employees and students to wash their hands when coming on to campus, before and after recess and lunches, and after bathroom breaks.**
- **Provide employees and students with effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e., methyl alcohol).**
- **Encourage employees and students to wash their hands for at least 20 seconds each time.**

### **Personal protective equipment (PPE) used to control employees' exposure to COVID-19**

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

## **Investigating and Responding to COVID-19 Cases**

This will be accomplished through the **[sccgov.org](http://sccgov.org)'s Education Case and Contact Reporting Portal**

Employees who had potential COVID-19 exposure in our workplace will be:

- **Offered COVID-19 testing at no cost during their working hours.**
- **Will be given Santa Clara County documents regarding COVID-19 quarantining procedures and what do to in case of a positive test result.**

## **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

**Employees have been instructed to report COVID-19 symptoms to their immediate supervisor immediately, and to report possible hazards to Pierre-Ludovic Perrot, Head of School or Laurel Maguire, Director of Finance and Operations.**

- That employees can report symptoms and hazards without fear of reprisal.  
**Employees have been told that the health and safety of the staff and students is the school's number one priority. The administration, therefore, welcomes communication from employees regarding reporting their own symptoms or hazards as they related to COVID-19, or any other safety risk.**
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.  
**Details on policies are available in the school's Employee Handbook.**
- Where testing is not required, how employees can access COVID-19 testing?  
**Employees can access testing through scheduling a test through their Kyla App or through their Primary Care Physician.**
- In the event 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 a workplace exposure, testing will be available through making an appointment through the employee's Kyla app, and then being able to go into one of their clinics for testing. In an event of a workplace outbreak, Kyla will be scheduled to come onsite to test employees.**
- 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.  
**Employees have been notified and trained on hazards in the workplace as they pertain to COVID-19. All employees have received a copy of our school's Reopening and Campus Safety Plans. Reminders are sent periodically to remind employees of social distancing and PPE protocols.**

## Training and Instruction

We 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 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 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 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.

## 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 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.
    - A doctor's note stating OK to return to work.
  - 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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*Laurel L Maguire*

**Laurel Maguire, Director of Finance and Operations**

## 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: entrances, bathrooms, hallways, aisles, walkways, staffroom

Evaluation of potential workplace exposure will be to all persons at the workplace or who may enter the workplace, including coworkers, employees, students, families, members of the public, customers or clients, and independent contractors. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

**Person conducting the evaluation:** **Laurel Maguire, Director of Finance and Operations.**

**Date:** **June 2020 (ongoing)**

**Name(s) of employee and authorized employee representative that participated:** **Pierre-Ludovic, Martine Trusz, Laurel Maguire, Jazmin Chandler, Janelle Washington**

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
Hallway, daily check in of symptoms and temperature	Hallway, daily morning check-in	Teachers and Staff, Visitors	Touchless temperature scanners, 6- foot markings on floor, signs to keep distanced, Kyla App for daily symptom monitoring
Interaction with Front Office Staff	Front Office - ongoing	Teachers, Staff, Students, Families, Members or the Public	Rope across front door of the front office reminding people to keep their distance
Staff Room and shared appliances / utensils.	Staff Room - Ongoing	Teachers and Staff	Closed Refrigerator, limited shared items such as coffee pots, utensils. Employees instructed to disinfect surfaces after use. Front office staff disinfects every two hours.
Teachers Desks	Throughout School Day	When students come up to teacher's desk, they may not be able to keep six-foot distancing.	Plexiglass Dividers provided
Air Ventilation	Classrooms, Offices, Breakrooms	Potential of virus to spread through the air	Installed MERV 13 filters, air purifiers, instructing staff to leave doors and window open where possible
Bathrooms and Handwashing	Throughout School Day	Potential for spread, not being able to keep student cohorts separated	Installed touchless faucets, soap, and paper towel dispensers. Rented flushable portable restrooms, renting additional hand wash stations

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
High Touch common use areas	Throughout School Day	Potential for spread	Cleaning and disinfecting throughout day, staff given own supplies, where practical

## Appendix B: COVID-19 Inspections

Date: **April 2021**

Name of person conducting the inspection: **Laurel Maguire**

Work location evaluated: **1522 Lewiston Drive Sunnyvale, CA 94087**

Exposure Controls	Status	Person Assigned to Monitor/Correct	Date Installed / Corrected
<b>Engineering</b>			
Barriers/partitions	Ample	Laurel Maguire/Janitorial	October 2021
Ventilation (amount of fresh air and filtration maximized)	Good Condition, filters changed every 3 months	Laurel Maguire / Janitorial	August 2020 / November 2020
Additional room air filtration	Good Condition, filters changed every 6 months	Laurel Maguire / Janitorial	Installed November / December 2020
<b>School Operations</b>			
Physical distancing in mornings and throughout day	Being monitored and followed. When not, employees are contacted, and reminder emails get sent.	Janelle Washington / Laurel Maguire	Ongoing
Surface cleaning and disinfection (frequently enough and adequate supplies)	Being followed. Janitorial and Front Office Staff throughout day, Janitorial nightly with UV lights,	Laurel Maguire / Janitorial	Added additional staff November 2020
Additional Bathroom and Hand washing facilities (adequate numbers and supplies)	Ample. Maintenance done Every Monday	Pierre-Ludovic / Laurel Maguire	Installed October 2020
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions	Being followed	Janelle Washington / Laurel Maguire	Ongoing
Staff Room protocols being followed, keeping distanced, no eating	Being monitored and followed. When not, employees are contacted, and reminder emails get sent.	Janelle Washington / Laurel Maguire	Latest communication to employees: 3-12-21
Cleaning of bathrooms and other shared spaces throughout the day	Being followed	Laurel Maguire / Janitorial	Ongoing
<b>PPE</b> (not shared, available and being worn)	Ample, being followed	Janelle Washington / Laurel Maguire	Automatic Ordering, ongoing



## **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 [www.sccgov.org](http://www.sccgov.org) - **Santa Clara County's Education Case and Contact Reporting Portal.**

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.

## Appendix D: COVID-19 Training Roster

Date: **4-27-21**

Person that conducted the training: **The American Red Cross; Laurel Maguire DFO, FASSV**

Trainings / Person conducting Training	Name / Signature
COVID-19 Returning to the Workplace – American Red Cross	Please see verification in employees' personnel files in the Business Office
SCPH Social Distancing Protocols – Laurel Maguire	Please see verification in employees' personnel files in the Business Office
School Site Specific COVID-19 Preparedness – Laurel Maguire	Please see verification in employees' personnel files in the Business Office
School Reopening Guidelines – SCC – Laurel Maguire	Please see verification in employees' personnel files in the Business Office

## Additional Consideration #1

### Multiple COVID-19 Infections and COVID-19 Outbreaks

**Should the French American School of Silicon Valley be identified by a local health department as the location of a COVID-19 outbreak, or if there are three or more COVID-19 cases in the workplace within a 14-day period, the following information in this section of the CPP will occur.**

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 **Santa Clara County guidelines**.

#### 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 pandemic 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 4 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.