COVID-19 Prevention Program (CPP) for Trinity Lutheran School and Preschool

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

Date: January 28,2021

Authority and Responsibility

The school principal 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 and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: training all employees on the use of the Identification of COVID-19 Hazards form and the COVID-19 inspections form and asking employees to report to the employer, without fear of reprisal, COVID-19 symptoms, possible COVID-19 exposures, and possible COVID-19 hazards at the workplace by using these forms and reporting immediately to their supervisor or school principal. In accordance with subsection (c)(3)(B)3., communicate information about COVID-19 hazards and the employer's COVID-19 policies and procedures to employees.

Employee screening

We screen our employees by having each employee self-screen according to CDPH guidelines when they first arrive to work. Face coverings are worn at all times and non-contact thermometers are used.

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 by the school principal and correction time frames assigned, accordingly.

Individuals are identified and notified by the school principal as being responsible for timely correction of the hazard.

Follow-up measures by the school principal 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:

- Reducing the number of persons in an area at one time, including visitors.
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Staggered arrival, departure, work, and break times.

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. A supply of clean, undamaged face coverings are readily accessible and available to all employees. Gate supervisors and screeners monitor non-employee entrance and enforce the use of face coverings by all non-employees.

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

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

We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by:
- Opening windows and doors
- Minimizing other hazards such as wildfire smoke or extreme heat by sending employees home and/or ventilating through windows that are not open as wide as usual.
- Maintaining the ventilation system on an annual maintenance contract and making needed repairs.
- Seeking professional assessment of the ventilation system to increase filtration efficiency to the highest level compatible with our existing ventilation system.

Cleaning and disinfecting

Employees have been trained on the following protocol and information. We implement the following cleaning and disinfection measures for frequently touched surfaces:
### Intensify Cleaning, Disinfection, and Ventilation

- Staff should clean and disinfect frequently-touched surfaces within school
  Frequently touched surfaces in the school include, but are not limited to:
  1. Door handles

2. Light switches
3. Sink handles
4. Bathroom surfaces
5. Tables
6. Student Desks
7. Chairs

- Limit use of shared playground equipment in favor of physical activities that require less contact with surfaces. The disinfector/fogger will be used on climbing/swinging/sliding equipment as is practical throughout the day in accordance with a cleaning and disinfecting schedule.
- Limit sharing of objects and equipment, such as toys, games and art supplies to the extent practicable. But where allowed, clean and disinfect between uses.
- Ensure safe and correct application of disinfectant and keep products away from students.
- Ensure proper ventilation during cleaning and disinfecting. Introduce fresh outdoor air as much as possible, for example, by opening windows where practicable.

Implementing Distancing Inside and Outside the Classroom

- Minimize contact at school between students, staff, families and the community at the beginning and end of the school day.
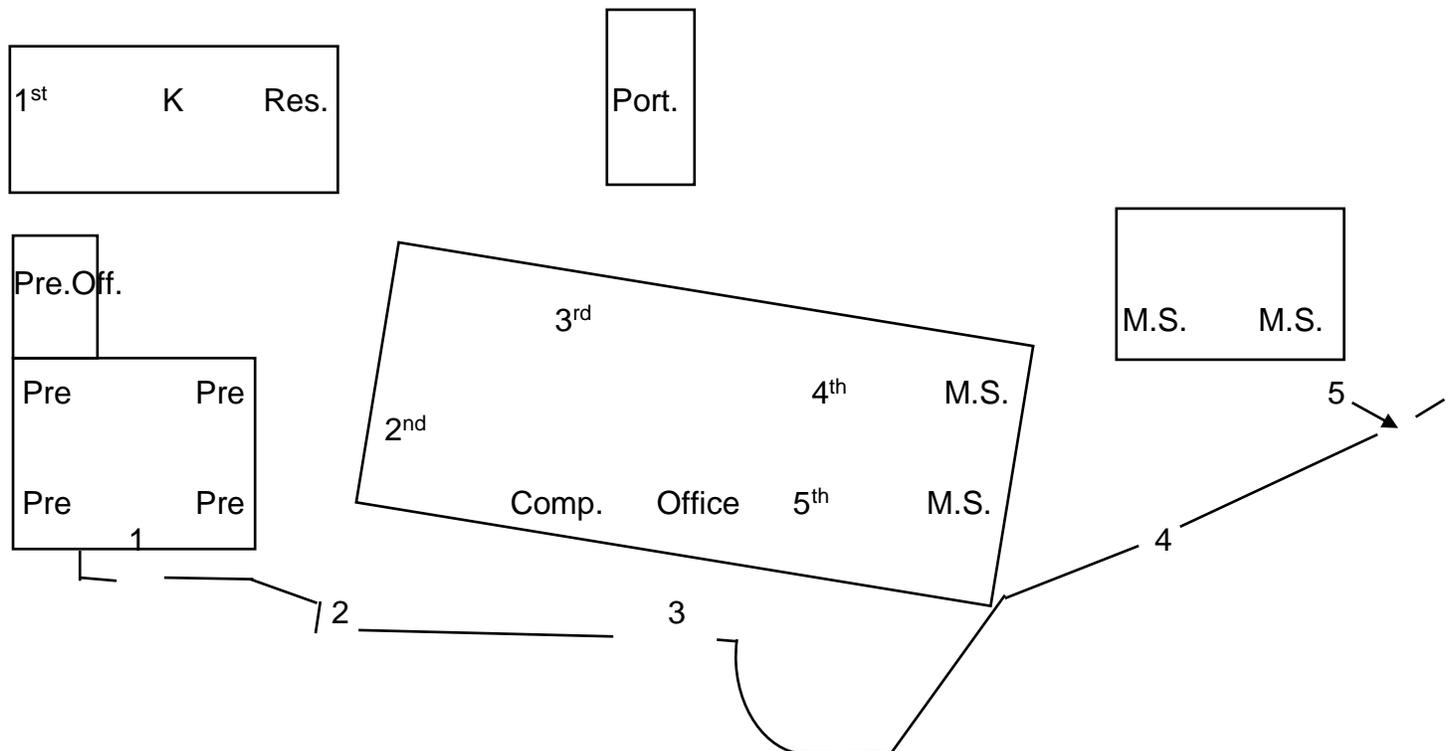
Fence: Breaks in lines with numbers indicate gate entrances
1) Preschool   2) K, 1st, 2nd   3) 3rd, 4th, 5th   4) 6th, 7th 5) 8th

- Staff should develop instructions for maximizing spacing and ways to minimize movement in both indoor and outdoor spaces that are easy for students to understand and are developmentally appropriate.
- Implement procedures for turning in assignments to minimize contact.

NON-CLASSROOM SPACES

- Limit nonessential visitors, volunteers and activities involving other groups at the same time.
- Limit communal activities where practicable. Alternatively, stagger use, properly space occupants and disinfect in between uses.
- Consider use of non-classroom space for instruction, including regular use of outdoor space, weather permitting. For example, consider part-day instruction outside.
- Minimize congregate movement through hallways as much as practicable.
- Serve meals in classrooms or outdoors at assigned picnic tables.
- Avoid sharing of foods and utensils (including birthday treats) and buffet or family-style meals. (including food based upon the curriculum or class project)

Limit Sharing

- Keep each child's belongings separated and in individually labeled storage containers, cubbies or areas.
- Ensure adequate supplies to minimize sharing of high-touch materials (art supplies, equipment, etc.) to the extent practicable or limit use of supplies and equipment to one group of children at a time and clean and disinfect between uses.

How to Disinfect your Workspace
Work surfaces that should be cleaned and disinfected regularly include telephones, computer equipment, and other frequently touched surfaces. Be sure that any cleaner you use is safe to use and will not damage office equipment. Use only disinfectants registered by the U.S. Environmental Protection Agency (EPA), and follow all directions and safety precautions indicated on the label.

How long are viruses and germs viable on surfaces in the workplace?
Influenza virus can survive on surfaces and still infect a person for up to 2-8 hours after being deposited on the surface.

What kills viruses and germs that are viable on surfaces in the workplace?
Most viruses are destroyed by heat (167-212°F). Several chemical germicides, including chlorine, hydrogen peroxide, detergents (soap), iodine-based antiseptics, and alcohols are effective against human viruses if used in proper concentration for a sufficient length of time. In addition to regular cleaning of surfaces, we will use the fogger/disinfector generator on all services daily. This will be done by the maintenance crew.

Each classroom is provided with disinfectant solution and cleaning rags
Teachers have been trained on proper cleaning and frequency of cleaning of all surfaces.
If a disinfectant product is not available, you can clean surfaces with a chlorine bleach solution made by adding 1 tablespoon of bleach to a quart (4 cups) of water; use a cloth to apply this to surfaces and let stand for 3 – 5 minutes before rinsing with clean water. (For a larger supply of disinfectant, add ¼ cup of bleach to a gallon [16 cups] of water.)

Wear gloves to protect your hands when working with strong bleach solutions or strong disinfectants.

What surfaces are most likely to be sources of contamination?
Germs and viruses spread when someone touches something that is contaminated and then touches his or her eyes, nose, or mouth. Droplets from a cough or sneeze of an infected person move through the air and carry viruses with them. A person can become infected by touching a surface where these droplets land before touching their eyes, mouth, or nose. Frequent hand washing prevents virus transmission from infected surfaces.

Infection:
Infection is caused by pathogens ('bugs') such as bacteria, viruses, protozoa or fungi getting into or onto the body. It can take some time before the microbes multiply enough to trigger symptoms of illness, which means an infected person may unwittingly be spreading the disease during this incubation period.

Infection Control:
Infection control in the workplace aims to prevent pathogens from coming into contact with a person in the first place. Employers are obliged under the Occupational Health and Safety Act 2004 to provide a safe workplace for their employees, including the provision of adequate infection control procedures and the right equipment and training.

Transmission of infection
Infectious agents can be spread in a variety of ways, including:
breathing in airborne germs – coughs or sneezes release airborne pathogens, which are then inhaled by others touching contaminated objects or eating contaminated food – the pathogens in a person's feces may be spread to food or other objects, if their hands are dirty, skin-to-skin contact – the transfer of some pathogens can occur through touch, or by sharing personal items, clothing or objects contact with body fluids – pathogens in saliva, urine, feces or blood can be passed to another person's body via cuts or abrasions, or through the mucus membranes of the mouth and eyes.

Assumption of risk
The basis of good infection control in the workplace is to assume that everyone is potentially infectious. Proper procedures have to be followed at all times. Every workplace should have an appropriate first aid kit, with at least one staff member trained in first aid. Equipment such as gloves and face shields should be provided if necessary.

Workplace infection control – personal hygiene practices
Infection control procedures relating to good personal hygiene include:
hand washing – the spread of many pathogens can be prevented with regular hand washing. Thoroughly wash your hands with water and soap for at least 20 seconds after visiting the toilet, before preparing food, and after touching clients or equipment. Dry your hands with disposable paper towels
unbroken skin – intact and healthy skin is a major barrier to pathogens. Cover any cuts or abrasions with a waterproof dressing
gloves – wear gloves if you are handling body fluids or equipment containing body fluids, if you are touching someone else's broken skin or mucus membrane, or performing any other invasive procedure. Wash your hands between each client and use fresh gloves for each client where necessary
personal items – don't share towels, clothing, razors, toothbrushes, shavers or other personal items.

Infection control and workplace cleanliness
Infection control procedures relating to cleanliness in the workplace include:
regularly washing the floors, bathrooms and surfaces (such as tables and bench tops) with hot water and detergent periodically washing the walls and ceilings thoroughly washing and drying mops, brushes and cloths after every use – drying mops and cloths is particularly important, since many pathogens rely on moisture to thrive using disinfectants to clean up blood and other spills of bodily fluids when using disinfectants – always wearing gloves, cleaning the surfaces before using the disinfectant, and always following the manufacturer's instructions exactly spot cleaning when necessary.

Dealing with spills of body fluids
Examples of body fluids include blood, saliva, urine and feces. When dealing with spills of body fluids, infection control procedures need to be followed carefully. Always: Isolate the area.
Wear gloves, a plastic apron and eye protection, such as goggles.
Soak up the fluid with disposable paper towels, or cover the spill with a granular chlorine-releasing agent for a minimum of 10 minutes. Scoop up granules and waste using a piece of cardboard (or similar), place in a plastic bag and dispose of appropriately.

Mix one-part bleach to 10 parts water and apply to the area for 10 minutes.
Wash the area with hot water and detergent.
Dry the area.
Dispose of paper toweling and gloves appropriately.
Wash your hands.
Rinse any contaminated clothing in cold running water, soak in bleach solution for half an hour, then wash separately from other clothing or linen with hot water and detergent.

Should we have a COVID-19 case in our workplace, we will implement the following procedures:
All employees are trained (see above sections on cleaning protocol) through employee in-service training prior to employment resuming on site. This training is given by the school administrator. In addition to proper hygiene, cleaning and disinfecting training, the following training is in place.

Health and Safety Protocol
How to Protect Yourself
When available, get the vaccination for COVID-19. Meanwhile, the best prevention is to avoid being exposed to the virus. As with any virus, there are also steps you can take to protect yourself and those around you:
Wash hands with soap and water for at least 20 seconds. If soap is not available, use an alcohol-based hand sanitizer.
Avoiding touching eyes, nose or mouth with unwashed hands.
Avoiding close contact with people who are sick
Staying away from work, school or other people if you become sick with any of the COVID-19 symptoms
Cover your cough or sneeze with a tissue and discard the tissue.
Physical distancing of 6 ft
Wearing face mask as required
Clean and disinfect frequently touched objects and surfaces
Daily COVID-19 Self-Assessment

People with COVID-19 have had a wide range of symptoms reported – ranging from mild symptoms to severe illness. Remember to stay home if you feel ill.
Fever or Chills
Cough
Shortness of breath and difficulty breathing
Fatigue
Muscle or body aches
Headache
New loss of taste and smell
Sore throat
Congestion or runny nose
Nausea or vomiting
Diarrhea

I**mmediately** call your supervisor and then call your healthcare provider right away if you develop symptoms.

What if I Am Sick?
Call your supervisor, then call your doctor. If you need to get tested right away SLO County has free testing sites. https://www.emergencyslo.org/en/index.aspx#
If you are experiencing a medical emergency, please call 9-1-1.
If you have symptoms other than fever, cough and shortness of breath, SLO County Public Health recommends staying home until you are well.
If you develop a fever while home, contact your supervisor, then your doctor immediately to get tested and stay home until:
at least 3 days (72 hours) after fever has resolved, AND
respiratory symptoms such as cough and shortness of breath have improved, AND at least 10 days have elapsed since symptoms first appeared.

What if I Get Sick at Work?
Notify your direct supervisor
An isolation room is available off of the front office.
Notify local health officials, staff, and families immediately of any possible case of COVID-19
Advise staff member to seek medical attention and get tested

Protocol is established if staff member is positive with COVID-19
Staff member will be advised to stay home
Those Trinity employees who have been in contact with the known infected staff member with COVID-19 will be informed and advised of next steps
Operations will disinfect workspace area
Follow recommendation of SLO County Public Health

Creating a Safe Environment
Complete HSA Basic Pest Management in the School and Childcare Settings
Continue with increased sanitizing and disinfecting methods
Face mask covering as required
Floor markers and directional foot traffic
Room occupancy posted
COVID-19 signage
Replace HVAC filters and fresh air flow when possible
Use Plexiglass screens where needed
Additional Outdoor tables have been put into place along with designated outdoor learning space
Discontinue non-essential travel
Plan for if you or your child gets sick at work. (Are emergency sub plans ready; is there someone who can care for your sick child for an extended period of time?)
Work with and follow the recommendations of SLO County Public Health Department

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 the employee first using the equipment prior to their departure. This will be done following above-described cleaning/sanitizing methods and personnel.

In order to implement effective hand sanitizing procedures, we:
- Have increased the number of handwashing stations
- Encourage and allow time for employee handwashing for at least 20 seconds.
- Provide employees with an effective hand sanitizer and prohibit hand sanitizers that contain methanol. Hands free hand sanitizing stations are in every work space along with person hand sanitizer bottles.

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.

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:

- Offered COVID-19 testing at no cost during their working hours.
- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to them.

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 should report COVID-19 symptoms and possible hazards to school principal via text message or phone call.
- Employees can report symptoms and hazards without fear of reprisal.
- Procedures or policies are in place for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness and are reviewed on a case-by-case basis.
- Where testing is not required, employees can access COVID-19 testing through the local testing centers in the county.
- In the event we are required to provide testing because of a workplace exposure or outbreak, we will advise affected employees of the procedures for testing (Testing Information - San Luis Obispo County (emergencyslo.org)and inform affected employees of the reason for the testing and the possible consequences of a positive test. Employees must quarantine at home until test results come back. In negative results, the employee may return to work. If positive test results, the employee will follow the protocol for COVID-19 and will not be allowed back to work until return-to work requirements are met.
  Information is communicated 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.

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.
- The fact that:
  - o COVID-19 is an infectious disease that can be spread through the air.
  - o COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
  - o 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 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 utilizing employer-provided employee sick leave benefits.
- 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.
- Use the **Appendix C: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise 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 100.4 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.

Top management representative formally approving the program and have them

Print Name: Jane Fairbank **Signature:** _Jane Fairbank_ **Date:** 1/28/2021

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 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: _____

Date: _____

Name(s) of employee and authorized employee representative that participated: _____

_____

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

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			
Traffic flow marked			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			

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 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) 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.

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 and/or 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 case 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):			

Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:			
All employees who may have had COVID-19 exposure and their authorized representatives.	**Date:**		
	Names of employees that were notified:		
Independent contractors and other employers present at the workplace during the high-risk exposure period.	**Date:**		
	Names of individuals that were notified:		
What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?		**What could be done to reduce exposure to COVID-19?**	
Was local health department notified?		**Date:**	

*Should an employer be made aware of a non-employee infection source COVID-19 status.

Appendix D: COVID-19 Training Roster

Date: _____

Person that conducted the training: _____

Employee Name	Signature

Additional Consideration #1

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.

Additional Consideration #2

Major COVID-19 Outbreaks

[This section will need to be added to your CPP should your workplace experience 20 or more COVID-19 cases within a 30-day period. Reference section 3205.2 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 twice a week COVID-19 testing, or more frequently if recommended by the local health department, to all employees present at our exposed workplace during the relevant 30-day period(s) and who remain at the workplace. COVID-19 testing will be provided at no cost to employees during employees' working hours.

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 local health department orders.

Investigation of workplace COVID-19 illnesses

We will comply with the requirements of our CPP I**nvestigating 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 or structures with mechanical ventilation, we will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, we will use filters with the highest compatible filtering efficiency. We will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems would reduce the risk of transmission and implement their use to the degree feasible.
- We will determine the need for a respiratory protection program or changes to an existing respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- We will evaluate whether to halt some or all operations at our workplace until COVID-19 hazards have been corrected
- Implement any other control measures deemed necessary by Cal/OSHA.

Notifications to the local health department

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

Additional Consideration #3

COVID-19 Prevention in Employer-Provided Housing
We do not provide employer housing

Additional Consideration #4

COVID-19 Prevention in Employer-Provided Transportation to and from Work
We do not provide employer transportation to and from work.