

## Section H2

# COVID-19 Prevention Program (CPP)

With some exceptions, all employers and places of employment are required to establish and implement an effective written COVID-19 Prevention Program (CPP) pursuant to an Emergency Temporary Standard in place for COVID-19 (California Code of Regulations (CCR), Title 8, section 3205(c)). Cal/OSHA has developed this model program to assist employers with creating their own unique CPP tailored to their workplace.

Employers are not required to use this program. Employers may create their own program or use another CCP template. Employers can also create a written CCP by incorporating elements of this program into their existing Injury and Illness Prevention Program (IIPP), if desired. Cal/OHA encourages employers to engage with employees in the design, implementation and evolution of their COVID-19 Prevention Program.

Using this model alone does not ensure compliance with the emergency temporary standard. To use this model program effectively, the person(s) responsible for implementing the CPP should carefully review:

- All of the elements that may be required in the following CCR, Title 8 sections:
  - 3205, COVID-19 Prevention
  - 3205.1, Multiple COVID-19 Infection and COVID-19 Outbreaks
  - 3205.2, Major COVID-19 Outbreaks
  - 3205.3, Prevention in Employer-Provided Housing
  - 3205.4, COVID-19 Prevention in Employer-Provided Transportation to and from Work
  - The four **Additional Considerations** provided at the end of this program to see if they are applicable to your workplace.
- The additional guidance materials available at [www.dir.ca.gov/dosh/coronavirus/](http://www.dir.ca.gov/dosh/coronavirus/)



March 17, 2021

# COVID-19 Prevention Program (CPP) for Santa Maria Joint Union High School District

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

## Authority and Responsibility

Kevin Platt, Assistant Superintendent - Human Resources, and Yolanda Ortiz, Assistant Superintendent - Business, have 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: all employees are encouraged to report any safety hazards or concerns. The District provides SIPE Form 2-588 for reporting safety hazards.

## Employee screening

We screen our employees by: Staff members will be provided with the list of COVID-19 symptoms and be instructed to call in sick and stay home if having symptoms of COVID-19 and to get tested for SARS-CoV2.

Daily reminders for at home screening will include one or more of the following:

1. text messages to staff, students, and parents
2. online screening application, where staff and students login in an answer screening questions

## 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:

Hazard assessment will be conducted by managers in conjunction with employee representatives. The hazards that affect large groups of employees will be corrected before those affecting one or two employees unless the small group hazard is deemed more critical than the large group hazard.

## 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.
- Adjusted work processes or procedures, such as reducing the number of people who physically handle network printers, copiers, and mail machines.
- Reference section 3205(c)(6)

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.

The District has secured a large supply of cloth and paper face coverings. Additionally, a large supply of face shields with drapes have been collected. These items are available at each work site and the stockpile is located in the District warehouse.

Face coverings may be accessed by employees at their school office or at the District Office based on their work location.

When an employee encounters a non-employee without a mask, the employee should report it to their supervisor.

Stockpiles in the District warehouse are monitored by Purchasing, warehouse, and Maintenance employees to maintain a ready supply.

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 wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability,

or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.

- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

### **Engineering controls**

We implement the following measures for situations where we cannot maintain at least six feet between individuals: Office workstations that cannot be spaced six feet apart will have privacy partitions installed; there is a ready supply of partitions and the District has the ability to fabricate custom partitions as needed. The affected employees will be required to wear a mask at all times.

When employees must perform physical labor that requires two people within six feet due to the weight or bulk of objects being handled (lifting, carrying, concrete, carpentry, welding, electrical work, grounds, or custodial work), employees must wear masks at all times. As soon as the required close work is complete, employees will separate by six feet to continue their work.

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

- Programming (where available) outside air dampers to be open to their maximum.
- Physically open manual outside air dampers to their maximum.
- During events of high outside temperature, unusually lower outside temperature, and wildfires outside air may be minimized to mitigate the effects of these environmental conditions. Employees will communicate with their site supervisor or principal if a change to the outside air is needed.
- The District currently performs periodic maintenance and preventive maintenance on the HVAC equipment as scheduled in the work order system.
- The District engaged a mechanical engineering firm to evaluate all HVAC equipment and its ability to accept the recommended MERV 13 filters. The report is complete, and most units will accept MERV 13 filters. For the few units that will not accept MERV 13 filters, they will continue to operate with MERV 11 filters while the conditions are evaluated for a permanent solution.

## **Cleaning and disinfecting**

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

A stockpile of cleaning and disinfecting supplies has been secured including disinfectant concentrate, secondary containers, microfibers, N-95 masks, disposable coveralls, gloves, and splash goggles.

- Employees are scheduled daily to disinfect frequently touched surfaces.
- Employees and authorized representatives have been notified via the Santa Barbara County Public Health Social Distancing Protocol.
- Ensuring adequate supplies and adequate time for it to be done properly.
- Informing the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection.

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

- **Equipment**
  - Disposable coveralls
  - Disposable gloves
  - Disposable N-95 mask
  - Splash goggles
  - Kai-O (2 ounces per gallon)
  - Lemon Quat (8 ounces per gallon)
  - Microfibers
  - UV-C Disinfecting machine
  - Backpack sprayer
- **Procedure**
  - Secure classroom or office door
  - Wait 24 hours before cleaning if possible
  - Operate the UV-C Cart to perform initial disinfection
  - Spray and wipe all surfaces with Kai-O and microfiber
  - Spray all surfaces with Lemon Quat, allow to air dry
  - Start UV-C Disinfecting machine; remove when complete
  - Dispose of coveralls, gloves, and mask
  - Wash microfibers and goggles

## **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:

- Employees using shared items will disinfect them prior to their use. When finished, the employee will disinfect the shared item.
- Disinfectant wipes are positioned near equipment such as copiers and printers.
- Spray bottles with disinfectant and microfibers are available as an alternative to pre-packaged wipes.
- Frequently touch surfaces (as noted in another section) are disinfected on a schedule throughout the workday.
- Gloves are available for employees who choose to use them or when they are required.

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users.

Frequently touched surfaces in shared vehicles will be disinfected between uses:

- Door handle
- Steering wheels
- Seatbelt buckles
- Armrests
- Shifter
- Turn signal and wiper handles
- Climate control and radio controls

## **Hand sanitizing**

In order to implement effective hand sanitizing procedures, we:

- The District provides numerous restrooms on each campus for handwashing.
- Additionally, several classrooms, work rooms, and break rooms have sinks available for handwashing.
- Each classroom has two hand sanitizer dispensers. Additional hand sanitizer dispensers are placed strategically throughout each site.
- Two spare portable hand washing stations are located at each comprehensive high school site, and one at Delta High School, for use in the event of an interruption to the site water supply.
- Employees are required to wash their hands when they enter the facility.
- Employees are encouraged to wash their hands before and after eating, after sneezing or blowing their nose, and frequently through the day.
- Employees trained 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 shields) as required by CCR Title 8, section 3380, and provide such PPE as needed.

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained. Reference section 3205(c)(E)

We provide and ensure use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

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

This will be accomplished by using the **Appendix C: Investigating COVID-19 Cases** form.

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

- Offered COVID-19 testing at no cost during their working hours.
- Informed regarding the available benefits.

## **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 to, and how they should report them.
- 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.
- Where testing is not required, how employees can access COVID-19 testing.
- 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.
- 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.

## 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:
  - 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. If the training is completed on line, it will be documented in the online program.

## 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 have demonstrated that the COVID-19 exposure is work related.
- 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).
- 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 SMJUHS and Santa Barbara County Contract tracing Forms for investigating cases to keep a record of and track all COVID-19 cases.



## 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 10 days from the time the order to quarantine was effective.
- 



Manager Responsible for Plan

3/18/2021

Date

## 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
<b>Engineering</b>			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
<b>Administrative</b>			
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			
<b>PPE (not shared, available and being worn)</b>			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			

## **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.

**The Contact Tracing Form is available from the Human Resources Department as a Fillable PDF document.** A sample is provided on the following pages for reference.

### Workplace Infection Control Coordinator COVID-19 Contact Tracing Guide

**Report**  
 Workplace Infection Control Coordinator: \_\_\_\_\_  
 Date of Report: \_\_\_\_\_ Time: \_\_\_\_\_

**Case Information**  
 Name of person: \_\_\_\_\_  
 Phone contact: \_\_\_\_\_  
 Email address: \_\_\_\_\_  
 Have you had direct or close contact with an individual who tested positive?  Y  N (choose one)  
*CDPH: close contact is within 6 ft for 15 min or more of infected person, regardless of face coverings.*  
 Date of last close contact with the individual: \_\_\_\_\_  
 Do you live with the individual? Y  N  (choose one)  
 If yes, most recent date of symptoms of household member: cold like \_\_\_\_\_  
 Are you experiencing or have you experienced any symptoms? Y  N  (choose one)  
 If yes, first date of symptoms? \_\_\_\_\_  
 Last date of symptoms, if applicable: \_\_\_\_\_  
*CDPH: symptoms may include fever, chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, nausea or vomiting, or diarrhea.*

**Testing**  
 Have you had or will you seek healthcare provider support? Y  N  (choose one)  
 Have you scheduled a COVID-19 test? Y  N  (choose one)  
 If yes, test date: \_\_\_\_\_  
 Have you had a positive COVID-19 test? Y  N  (choose one)  
 If yes, test date: \_\_\_\_\_  
*Please note that testing negative does not negate the need to quarantine for 14 days from the date of close contact exposure to someone who has tested positive. On average, people start showing symptoms on day 5 from date of exposure but may not show symptoms at all and can still be infectious.*

**Worksite Exposure**

At which SMJUHS D locations have you been working, starting two days prior to the onset of your symptoms (if any) to now?

Since the date of exposure, with which colleagues have you had direct or close contact (within 6 feet for at least 15 minutes) regardless of face coverings? Please list.

**Quarantines and Isolation [CDPH Guidance](#)**

Please work with Human Resources to finalize quarantines and inform HR whether or not the employee will be working remotely during quarantine, as approved by the division lead.

*Quarantines should be 14 days from the last date of close contact with someone who tested positive and the employee should be encouraged to seek healthcare support and COVID-19 testing as available.*

*Individuals who test positive and are symptomatic must remain home (isolate) for at least 10 days from the first date of symptoms and will isolate as long as infectious—at least 10 days after becoming ill and symptoms improving and no fever without use of medicine for at least 24 hours.*

*Individuals who test positive and are asymptomatic must remain home (isolate) for at least 10 days from the date of the positive test.*

*Individuals who test negative and are asymptomatic and had close contact with someone who tested positive must remain home for the 14-day quarantine from last date of close contact.*

*Individuals who live with a household member who tests positive must quarantine for the duration of the household member's illness and 14 days after the last date of the household member's symptoms unless the individual becomes ill, in which case, the individual will isolate as long as infectious—at least 10 days after becoming ill and symptoms improving and no fever without use of medicine for at least 24 hours.*

**Additional Support**

Was Public Health contacted by HR?

Yes  No  (choose one)

Name of Public Health Department representative:

Public Health guidance/recommendation:

Date of Return from Quarantine:

## Appendix D: COVID-19 Training Roster

Date: **[enter date]**

Person that conducted the training: **[enter name(s)]**

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

#### **COVID-19 hazard correction**

In addition to the requirements of our CPP **Correction of COVID-19 Hazards**, we will take the following actions:

- In buildings 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**.