

Model 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/OSHA 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/



November 2020; Revised August, 2021

COVID-19 Prevention Program (CPP)

for College Preparatory Middle School

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

Date: 2/26/2021; Revised August 25, 2021

Authority and Responsibility

Mitchell Miller, Director of School Operations and Christina Callaway, Director of School 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 are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

- Participating in staff training, reading and following the stated safety protocols and procedures for our campus including the "CPMS Safe Opening Plan (2021-2022)".
- Staff will be instructed to inform the administration immediately if a hazardous condition is observed or known.

Employee Screening

We screen our employees by:

- Requiring that they complete the Temperature and Symptoms Check **PRIOR** to arriving at school each day.
- Check into the front office each day through the lobby and will give the "Thumbs Up" indicator that they have checked themselves for symptoms of COVID-19 to designated front office personnel.
- Denying entry and sending home any individual with a temperature of greater than or equal to 100 degrees Fahrenheit.

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:

- Upon discovery or notification of a hazardous condition, administrative staff will immediately assess the situation and secure/remedy the situation as to end further hazard or exposure.
- Individuals who may be involved or have impact will be notified of the situation and the corrective measures taken.
- Follow up documentation will be provided as well as any additional training/support necessary to avoid issues in the future.

Control of COVID-19 Hazards

Physical Distancing

Where possible, we ensure physical distancing at all times in our workplace by:

- Creating grade level stable student cohorts, related class schedule and seating charts.
- Reducing the number of any persons in any area at one time by implementing new work processes and procedures including staggered class schedules, departures and break times.
- Frequent training and review of appropriate safe distancing protocols and procedures.
- The installation and use of floor decals to promote physical distancing as well as instructional signage indicating direction and path of travel inside and outside our facility.

Face Coverings

All staff and students, school guests and service providers will utilize face coverings as indicated by recommendations from the [Center for Disease Control](#) and the [California Department of Public Health](#).

Face Coverings must be worn by students, staff, school guests, and service providers:

- While waiting to enter campus
- While on school grounds (except when physically distanced drinking and eating)
- While leaving school
- While participating in any sports or physical activity, indoors or outdoors when unable to maintain social distancing.

Types of Allowable Face Coverings Include:

Washable Cloth Face Covering

- Include multiple layers of fabric (at least 2 layers)
- Should fit snugly
- Be secured with ties or ear loops
- Be able to be laundered without changing shape

Disposable Face Covering

- Disposable masks will be provided to employees, students, staff and visitors when they forget to bring a washable face covering
- The school will maintain a supply of disposable face coverings for anyone who is unable to provide their own.

Face Shields

- Face Shields may be provided to staff to wear at school upon request.
- Face coverings (over nose and mouth) are still recommended when wearing a face shield.

A reusable face shield can be used under the following circumstances:

- When a person is likely to interact with a person with a hearing impairment
- When providing or participating in a form of therapy that requires the student/client to see the other person's face
- By students who cannot medically tolerate a cloth face covering over the nose and mouth
- When necessary as protection from possible contact with bodily fluids (along with a face covering)

All staff will implement best practices in the use of Personal Protective Equipment (PPE) as outlined in the current CDC and CDPH guidance.

Responses for failing to wear a cloth face covering include:

- Providing a disposable face covering
- Exclusion from campus

All students are required to wear face coverings unless exempt.

We will exempt students from wearing a face covering if they fall within the CDPH guidelines for individual exemption. Students unable to wear a cloth facial covering will be required to wear a plastic face shield and drape. Those who are exempt from wearing a facial covering and who cannot or chose not to use a plastic face shield will be given the option of distance learning. Individuals who refuse to wear a face covering but who are not exempt will not be permitted to remain on campus and will be given the option of distance learning.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, will be provided the appropriate review of the safety procedures and protocols and be supplied with the PPE needed to ensure compliance and a safe working environment.

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.

Testing Requirements

CPMS will implement symptom and exposure screening schedule based on current CDPH recommendations:

- Rapid molecular PCR testing will be available for "symptomatic" students and staff to determine if symptoms are related to COVID-19 and need for potential quarantine/isolation.
- Weekly Antigen testing will be available for unvaccinated staff as mandated by the state of California.
 - In August, Dr. Tomás J. Aragón, California's public health officer, released a [public health order](#) requiring all school workers, including paid and unpaid adults serving in a school setting, to provide verification of their vaccination status, and if unvaccinated, to undergo weekly COVID-19 testing.

Staff testing is required when there are multiple COVID-19 cases or major outbreaks based on Cal/OSHA requirements:

- All exposed employees shall be tested immediately and once a week thereafter if 3 or more COVID-19 cases occur in the workplace within a 14 day period
- If there are 20 or more COVID-19 cases in a workplace within a 30 day period, then all exposed employees will be tested twice per week, or more frequently if recommended by the San Diego County Department of Health

Engineering Controls

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

- Limiting the number of individuals in any cohort/situation
- Use of face coverings at all times
- Use of directional signage/spacing floor decals
- Use of Movable Plexiglas partitions/barriers

As a new building, College Prep is equipped with a state of the art HVAC system, allowing for ongoing fresh air mixture and airflow as well as the filtration of particles and contaminants throughout the school day. The HVAC and mechanical systems at CPMS were engineered to meet the ventilation/air exchange needs of our building and newly installed in 2019.

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

- Adjusting our HVAC maintenance schedule to comply with CDPH and public health guidelines.
- Utilizing high quality, category 3 MERV-11 filters. These types of filters are typically used in high end commercial buildings and hospital laboratories, filtering down to 1.0 – 3.0 micron particle size. The air filters utilized are at the highest MERV level compatible with our HVAC system, without decreasing its efficient rate of air exchange.
- Additionally, commercial-grade air purifiers have been installed in each classrooms which utilize HEPA and ION filters to filter the air continually throughout the day.

Cleaning and Disinfecting:

We implement the following cleaning and disinfecting measures:

- College Prep contracts with a licensed Cleaning and Building Maintenance Company. These contracted custodians, whom have received the training on the proper use of cleaning materials and techniques, will thoroughly clean and disinfect all interior and exterior areas on a daily basis
- Cleaning and sanitation supplies will be well stocked on campus and equipped and replenished as needed to maintain a sufficient supply. Cleaning products should be from the EPA approved list “N” for use against COVID-19

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

While our contract with our licensed Maintenance Company provides the custodial services that are primarily responsible for maintaining a clean and healthy workplace; it is also the responsibility of all of the school staff members to be mindful of their behavior and to clean and disinfect when and where they can throughout the day. It is up to everyone on site to participate in the process of good workplace hygiene in order to maintain a clean working /learning environment.

- All staff members using shared resources such as copy machines, telephones, computers, printers, restrooms, refrigerators, microwaves, etc. will wash their hands with soap and water for 20 seconds or use hand sanitizer before/after each use
- Disinfecting wipes, paper towels, tissues and disposable gloves will be provided, available and replenished, near all shared resources for use after touching or utilizing equipment and for disinfecting after each use.
- Classroom teachers will be provided with disinfecting spray and disinfecting wipes to use at appropriate times throughout the school day in order to disinfect surfaces, touch points, workstations, and shared materials when appropriate
- Teachers using disinfectants will be trained in their appropriate use (frequency/scope) in accordance with Department of Pesticide Regulation guidelines
- All cleaning products will be kept out of children's reach and stored in a space with restricted/supervised access
- Custodians will use a combination of industry standard cleaning methods in accordance with the Cleaning and Disinfecting Guides

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

When a student, teacher, or other staff member tests positive for COVID-19, Custodians with PPE will enter the classroom(s) where the individual is primarily assigned and thoroughly clean, disinfect, and sanitize all surfaces, touch points, and flooring.

Shared tools, equipment and personal protective equipment (PPE)

- PPE must not be shared, e.g., gloves, goggles and face shields.
- All staff members using shared resources such as copy machines, telephones, computers, printers, restrooms, refrigerators, microwaves, etc. will wash their hands with soap and water for 20 seconds or use hand sanitizer before/after each use.
- Disinfecting wipes, paper towels, tissues and disposable gloves will be available and replenished near shared resources to be used for handling equipment to avoid direct hand contact or for disinfecting after each use.
- Classroom teachers will be provided with disinfecting spray and disinfecting wipes to use at appropriate times throughout the school day in order to disinfect surfaces, touch points, and shared materials when appropriate.
- Teachers using disinfectants will be trained in their appropriate use (frequency/scope) in accordance with Department of Pesticide Regulation guidelines.

Hand Sanitizing

In order to implement effective hand sanitizing procedures, we:

- Will instruct Staff and students, and remind and reinforce to use good hygiene and safety protocols throughout the school day.
- Regular Hand Cleansing - Washing hands with soap and water, or use hand sanitizer if soap and water is not available:
 - School: At home before leaving for school, upon arrival to the classroom, throughout the school day; after departing from school.
 - Restrooms: Before and after each use.
 - Tissues: After each use as well as instructions to dispose of properly.
 - Meals: Before and after eating food (i.e. Nutrition Break, Lunch, etc...).
 - Outdoor Activities: Before and after playing outside.

- Students will be taught by staff to wash their hands by getting them wet, applying soap, rubbing the soap vigorously on palms, between fingers, and on back of hands for 20 seconds, rinsing and rubbing under running water, then drying.
- Students will be instructed/reminded by staff to sanitize their hands using liquid hand sanitizer when soap and water is not available for washing by placing a dime size dollop on palm of hand, rubbing on palms, between fingers, and back of hands until dry.
- Nose Wiping/Blowing: Students will be instructed/reminded to only blow or wipe their nose with a clean tissue, throw it away, and then cleanse their hands.
- Coughing/Sneezing Etiquette: Students will be instructed/reminded to cough or sneeze into the inside of their elbow or a clean tissue.
- Keep Hands Away From Face: Students will be instructed/reminded to not touch any part of their face (i.e. nose, mouth, eyes) without a clean tissue.
- Automatic Hand sanitizer dispensers will be available in each classroom and throughout the school campus for students and staff use.
- School facilities (i.e. bathrooms, water bottle fillers) will be designated throughout the school campus based upon proximity to classrooms in order to minimize movement and congregations in bathrooms to the greatest extent practical.
- Sinks are also located in all of the restrooms, multipurpose room and science classrooms. Automatic hand-sanitizing stations have been installed in each classroom and workspace on campus.

Personal protective equipment (PPE) 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.

Investigating and Responding to COVID-19 Cases

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

1. Any staff member who becomes ill or exhibits any COVID-19-like symptoms will contact the Front Office and school administration will be notified.
2. Designated staff will be sent to the classroom so that the staff member may go to the Screening Office to complete a Temperature and Symptoms Check by designated staff: [COVID-19 symptoms](#)
3. If staff is found to have a temperature above 100.0F or is found to have COVID-19 symptoms, the staff member will leave the school campus immediately for further appraisal by a health care provider and school administration will be notified.
4. With the staff member's permission, the school will conduct a rapid molecular PCR test to determine if the symptoms are related to COVID-19.
 - a. If the results are positive for COVID-19, the staff member will leave the school campus immediately in order to begin the Quarantine process (dependent upon vaccination status).
 - i. If the staff member is unable to transport themselves, a family member or emergency contact may be contacted by the school administrator or designee.
 - ii. If at any time the staff member's symptoms become severe (i.e. chest pains, difficulty breathing, bluish color of lips/face, unconsciousness), 911 may be contacted by school administrator/designee

- b. If testing is conducted outside of school, and is informed that the staff member is found to be COVID-19 positive, school administrator will be notified and will proceed with the Procedures for Positive COVID-19 Cases
 - i. Refer to [the COVID-19 K-12 Decision Tree](#).
 - c. If the results are negative for COVID-19, the staff member will leave the school campus immediately. The staff member may return to school once the symptoms have improved, typically 24 hours without fever and no use of fever-reducing medication.
 - d. School administrator/designee will contact staff member and follow [the COVID-19 K-12 Decision Tree](#) for guidance on when the staff member may return to school.
5. A student or staff member who has come in close contact with someone who has known or suspected Coronavirus Disease 2019 (COVID-19) should remain at home and follow the recommended [Home Quarantine guidance](#).
 6. Quarantine keeps someone who might have been exposed to the virus away from others. Close contact includes being within 6 feet of someone who has COVID-19 for a cumulative total of 15 minutes or more over a 24-hour period, contact with their body fluids or secretions (such as being coughed on or sneezed on), sharing utensils or saliva, or providing care without wearing protective equipment.
 7. After being exposed, it can take 2-14 days for symptoms to appear, so it may take up to 14 days after the last contact with the individual with known or suspected COVID-19 if someone is infected or not. Self-quarantine is recommended in case someone does have the virus so that they don't pass on the virus to anyone else, especially since individuals can spread the virus up to 48 hours before symptoms appear.
 8. Note: Fully vaccinated students and staff exposed to COVID-19 may refrain from quarantine following a known exposure if asymptomatic, [as per CDPH's Fully Vaccinated People Recommendations](#). Testing is recommended at Day 3, 4, or 5.

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 their site administrator
- 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 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.

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 it's been demonstrated that the COVID-19 exposure is work related. This will be accomplished by 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 F. 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 that 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.
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Mitchell Miller, Director of School Operations Christina Callaway, Director of School Business

Date: February 26, 2021 / Revised August 25, 2021

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:

| | | |
|--|--|--|
| <p>All employees who may have had COVID-19 exposure and their authorized representatives.</p> | <p>Date:</p> | |
| | <p>Names of employees that were notified:</p> | |
| <p>Independent contractors and other employers present at the workplace during the high-risk exposure period.</p> | <p>Date:</p> | |
| | <p>Names of individuals that were notified:</p> | |
| <p>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</p> | <p>What could be done to reduce exposure to COVID-19?</p> | |
| <p>Was local health department notified?</p> | <p>Date:</p> | |

*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 |
|---------------|-----------|
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Additional Considerations

Multiple COVID-19 Infections and COVID-19 Outbreaks

This section of the CPP is only applicable if a 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 the workplace within a 14-day period. 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.

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 Considerations

Major COVID-19 Outbreaks

This section of the CPP is only applicable should the workplace experience 20 or more COVID-19 cases within a 30-day period. 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**.