

# COVID-19 Prevention Program (CPP) for the Santa Cruz City Schools

This CPP is designed to control employees' exposures to the SARS-CoV-2 virus (COVID-19) that may occur in our workplace.

COVID-19 Guidance for Reopening Schools at:

- covid19quidance.santacruzcoe.org
- Santa Cruz City Schools Safety Plan
- School Facilities, Workplace (Non School) and Childcare Facilities Guidance

Date: January 7, 2022

# **Authority and Responsibility**

The Superintendent of Schools has the 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 implement the following in our workplace:

- Conduct workplace-specific evaluations using the <u>Appendix A</u>: Identification of COVID-19 Hazards form.
- Document the vaccination status of our employees by using the <u>Vaccination Survey Link</u>, which is maintained as a confidential medical record.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Develop COVID-19 policies and procedures to respond effectively and immediately to individuals at the workplace who are a COVID-19 case to prevent or reduce the risk of transmission in the workplace
  - o Employees with a positive test need to report this information to their supervisor immediately
  - Supervisors will notify COVID Compliance Manager if the case is regarding a student or a case involves a staff member
  - The Site POC and/or central office team will make contact with the positive case (student or staff) to gather all pertinent information
  - A plan for each case will be developed and communicated to the workplace and the individual who tested positive
- 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 per CDPH Guidance using the <u>Appendix B</u>: COVID-19 Inspections form as

needed to identify and evaluate 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 representative(s) are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

- Researched Federal, State, and Local resources for office space return to work guidelines.
- Reviewed Injury and Illness Prevention Plan COVID-19 addendum.
- Procedures and Protocols created and reviewed with employees.
- Supervisors with support from the central office will conduct walk-throughs of office spaces and school sites.
- Maintenance and Operations modified work spaces to be in compliance with COVID-19 safety precautions per guidelines and injury and illness prevention plan.
- Staff Training plan implemented.

#### **Employee screening**

- Employees are instructed not to come to work if they are feeling any symptoms of an illness.
- Employee COVID-19 Obligation
- All staff must complete the screening tool before coming to work on the first day. This is an agreement that
  at any time if they have symptoms they will notify their supervisor and not come into work. All employees
  will receive an email from <a href="https://example.com/HR@sccs.net">HR@sccs.net</a>, which they will complete. This agreement will be in effect for the
  2021-22 school year. Below is the Health Report for SCCS Employees to complete.
  - o SCCS EMPLOYEE HEALTH REPORTING ACKNOWLEDGEMENT FOR COVID-19 RESPONSE 2021-2022 SCHOOL YEAR

#### **Correction of COVID-19 Hazards**

Unsafe or unhealthy work conditions, practices or procedures are documented on the <u>Appendix B</u>: COVID-19 Inspections form, and corrected in a timely manner based on the severity of the hazards, as follows:

- In an effort to maintain a safe and healthy place during the COVID-19 pandemic, please report any issues that you become aware of that need the attention of your supervisor. Your supervisor will work with MOT and HR to resolve any issues.
- Reporting an issue will not result in corrective action and no repercussions will be taken against any employee for submitting a report.

#### **Control of COVID-19 Hazards**

Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees when they are indoors or in vehicles, and where required by orders from the

California Department of Public Health (CDPH).

- Please contact your supervisor or Human Resources for face coverings.
- CDC Guidelines for Making & Using Face Coverings training.
- Face Covering protocols will be communicated to visitors in the lobby.
- Guidelines for Face Coverings

Employees required to wear face coverings in our workplace may remove them under the following conditions:

- When an employee is alone in a room or a vehicle.
- While eating or 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 feasible.
- Employees are required to wear respirators in accordance with our respirator program that meets section 5144 requirements.
- 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. Such employees will wear an effective, non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition permits it.

• Specific tasks that cannot feasibly be performed with a face covering. This exception is limited to the time in which such tasks are being performed.

Any employee not wearing a required face covering or allowed non-restrictive alternative, will be at least six feet apart from all other persons unless the unmasked employee is either fully vaccinated or tested at least weekly for COVID-19.

We will not prevent any employee from wearing a face covering when it is not required unless it would create a safety hazard, such as interfering with the safe operation of equipment.

Face coverings will also be provided to any employee that requests one, regardless of their vaccination status.

## **Engineering controls**

For indoor locations, using Appendix B, we identify and evaluate how to maximize, to the extent feasible, ventilation with outdoor air using the highest filtration efficiency compatible with our existing ventilation system, and whether the use of portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems, would reduce the risk of transmission by:

SCCS has inspected all facilities along with an in depth evaluation of our ventilation systems by Geo. H. Wilson HVAC. Ventilations systems are serviced quarterly by outside contractors. All HVAC systems have MERV 13 filters installed and outside air intake has been maximized. All operable windows are working properly and doors are able to be propped open when necessary. Portable HEPA air filters have been delivered to classrooms and offices where the outside air flow is suspect.

In the event of poor air quality the SCCS will monitor indoor air quality utilizing a portable air quality monitor. HVAC filters will be inspected during and after a poor air quality event to determine if replacement is required before the quarterly scheduled inspection.

## Cleaning and disinfecting

We implement the following cleaning and disinfection measures for frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, phones, headsets, bathroom surfaces, and steering wheels:

- Maximum occupancy for enclosed office spaces and conference rooms has been adjusted to comply with safe physical distancing requirements and will be adjusted throughout the COE.
- Workstations have been adjusted to meet physical distancing requirements by M&O as needed. Additional modifications may be made upon request.
- High-touch sanitization will be performed daily in high traffic areas (doorknobs, railings, elevator buttons, faucets, etc.).
- COE M&O teams will only use cleaning agents that have been EPA-approved for use against SARS-CoV-2.
- Deep cleaning will take place using electrostatic sprayers.
- Employees will be required to perform limited non-custodial cleaning and disinfecting of their own workstation and of shared items (ex. copiers, staplers, paper cutters, fridge doors, etc). The best practice to keep ourselves safe is to clean an item before AND after each use.
- Safe physical distancing and hygiene guidelines that prevent the spread of infectious disease are posted throughout the building in hallways, restrooms, conference rooms, waiting areas, and office spaces.
- M&O will refill hand sanitizer bottles and cleaning supplies regularly and ensure hand soap is replenished daily.
- The high-efficiency particulate air (HEPA) filtration systems at all Santa Cruz COE sites currently meet the
  recommended filtration level for safe air quality in our facilities and will routinely be inspected and
  maintained.

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

 Close off areas visited by the ill persons. Open outside doors and windows and use ventilating fans to increase air circulation in the area. Wait 24 hours or as long as practical before beginning cleaning and disinfection. • Cleaning staff should clean and disinfect all areas such as offices, bathrooms, common areas, shared electronic equipment (like tablets, touch screens, keyboards, remote controls) used by the ill person(s), focusing especially on frequently touched surfaces.

#### Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Posted CDC handwashing guidance is posted in all restrooms and break rooms.
- Frequent handwashing must occur with soap and water for a minimum of 20 seconds.
- Hand washing is always more effective than hand sanitizer, but if a sink is not in proximity, utilize the hand sanitizer stations provided.

# 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 <u>CCR Title 8, section</u> 3380, and provide such PPE as needed.

When it comes to respiratory protection, we evaluate the need in accordance with <a href="CCR Title 8 section 5144">CCR Title 8 section 5144</a> when the physical distancing requirements are not feasible or maintained. [reference section 3205(c)(E) for details on required respirator and eye protection use.]

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.

#### Testing of symptomatic employees

We make COVID-19 testing available at no cost to all employees at school sites twice weekly and who are asymptomatic for COVID-19. Employees with symptoms can test at Inspire Drive-Thru locations at no cost to employees.

# Investigating and Responding to COVID-19 Cases

We have developed effective procedures to investigate COVID-19 cases that include seeking information from our employees regarding COVID-19 cases, close contacts, test results, and onset of symptoms. This is accomplished by using the **Appendix C: Investigating COVID-19 Cases** form.

We also ensure the following is implemented:

The District has established a partnership with the Santa Cruz County Office of Education & Inspire Diagnostics for surveillance testing of employees and students. Asymptomatic school site employees and students are offered the option to test twice weekly COVID Screening at their <u>school site</u>. Employees not at school sites or symptomatic employees and students can test in Ben Lomond, Santa Cruz, Aptos, and Watsonville (<u>Select a Testing Locations</u>).

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 and families of students of the reason for the testing and the possible consequences of a positive test.

- School Site Weekly Testing Schedule with Inspire Diagnostics (asymptomatic and screening only): <a href="https://docs.google.com/document/d/1qHXLWP9oCEiUIApYgj7pO0dd881BBU-b8h5FHUHYu-M/edit?usp=sharing">https://docs.google.com/document/d/1qHXLWP9oCEiUIApYgj7pO0dd881BBU-b8h5FHUHYu-M/edit?usp=sharing</a>
- Additional Testing Locations with Inspire Diagnostics (community, asymptomatic, and symptomatic): https://covid19test.santacruzcoe.org/prepare-for-testing
- Employees that had a close contact are offered COVID-19 testing with Inspire Diagnostics at no cost during their working hours, excluding:
  - COVID-19 cases who were allowed to return to work per our return-to-work criteria and have remained free of symptoms for 90 days after the initial onset of symptoms, or for cases who never developed symptoms, for 90 days after the first positive test.

- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to employees:
  - 2021 COVID-19 Supplemental Paid Sick Leave
- Written notice within 1 day of your knowledge of a COVID-19 case that people at the worksite may have been exposed to COVID-19. This notice will be provided to all employees (and their authorized representative), independent contractors and other employers at the worksite during the high-risk exposure period. These notifications must meet the requirements of T8CCR section 3205(c)(3)(B) and Labor Code section 6409.6(a)(4); (a)(2); and (c), and in a form readily understandable by employees and can be anticipated to be received by the employee.

#### **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, possible close contacts and hazards to their immediate supervisor by phone. Supervisor will contact HR and or Student Services.
- Employees can report symptoms, possible close contacts and hazards without fear of reprisal.
- Access to COVID-19 testing when testing is required.

The 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. Human Resources will have the sole responsibility of keeping all information about COVID-19 cases confidential and will not disseminate information except as required by local health departments.

# **Training and Instruction**

We provide effective employee training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards, and how to participate in the identification and evaluation of COVID-19 hazards.
- Information regarding COVID-19-related benefits (including mandated sick and vaccination leave) 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.
  - o 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.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical
  distancing, face coverings, increased ventilation indoors, and respiratory protection decrease the spread
  of COVID-19 and are most effective when used in combination.
- The right of employees that are not fully vaccinated to request a respirator for voluntary use, without fear of retaliation, and our policies for providing the respirators. Employees voluntarily using respirators will be trained according to section 5144(c)(2) requirements:
  - How to properly wear them.
  - How to perform a seal check according to the manufacturer's instructions each time a respirator is worn, and the fact that facial hair can interfere with a seal.
- 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.
   Since COVID-19 is an airborne disease, N95s and more protective respirators protect the users from airborne disease, while face coverings primarily protect people around the user.
  - o The conditions where face coverings must be worn at the workplace.
  - o That face coverings are additionally recommended outdoors for people who are not fully

- vaccinated if six feet of distance cannot be maintained.
- Employees can request face coverings and can wear them at work regardless of vaccination status and without fear of retaliation.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- Information on our COVID-19 policies and how to access COVID-19 testing and vaccination, and the fact that vaccination is effective at preventing COVID-19, protecting against both transmission and serious illness or death.
- Employee Training Plan:
- ➤ Keenan Cal/OSHA COVID-19 Protection Plan Training All employees are required to complete this training online
- ➤ Keenan: Cal/OSHA COVID-19 Protection Plan Training Supplement- All employees are required to complete this training online
- Completion of courses will be documented through Keenan reports

# Exclusion of COVID-19 Cases and Employees who had a Close Contact

Where we have a COVID-19 case or close contact in our workplace, we limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees that had a close contact from the workplace until our return-to-work criteria have been met, with the following exceptions:
  - Employees who were fully vaccinated before the close contact and who do not develop COVID-19 symptoms.
  - COVID-19 cases who returned to work per our return-to-work criteria and have remained free of COVID-19 symptoms, for 90 days after the initial onset of COVID-19 symptoms, or for COVID-19 cases who never developed COVID-19 symptoms, for 90 days after the first positive test.
- For employees excluded from work, continuing, and maintaining employees' earnings, wages, seniority, and all other employees' rights and benefits. This will be accomplished by: <u>2021 COVID-19</u>
   <u>Supplemental Paid Sick Leave</u> and leaves available through collective bargaining units agreements and state and federal law.
- 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 and outbreaks at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with 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 <u>Appendix C</u> or SCCS Internal Document: Investigating COVID-19 Cases form to keep a record of and track all COVID-19 cases.

#### Return-to-Work Criteria

- COVID-19 cases with 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, and
  - o COVID-19 symptoms have improved, and
  - o At least 10 days have passed since COVID-19 symptoms first appeared.
- COVID-19 cases who tested positive but never developed 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 once the requirements for "cases with symptoms" or "cases who tested positive but never developed symptoms" (above) have been met.
- Persons who had a close contact may return to work as follows:
  - Close contact but never developed symptoms: when 10 days have passed since the last known close contact.
  - Close contact with symptoms: when the "cases with symptoms" criteria (above) have been met, unless the following are true:
- The person tested negative for COVID-19 using a polymerase chain reaction (PCR) COVID-19 test with specimen taken after the onset of symptoms; and
- At least 10 days have passed since the last known close contact, and
- The person has been symptom-free for at least 24 hours, without using fever-reducing medications.
- If an order to isolate, quarantine, or exclude 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.

Reviewed and Approved by:	
Superintendent's Signature	Date: 08/01/2021

# **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, trainings, entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cooldown 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 stationary work.

Person conducting the evaluation: [enter name(s)]

Date: [enter date]

Name(s) of employee and authorized employee representative that participated: [enter name(s)]

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

# **Appendix B: COVID-19 Inspections**

[This form is only intended to get you started. Review the information available at www.dir.ca.gov/dosh/coronavirus/ for additional guidance on what to regularly inspect for, including issues that may be more pertinent to your particular type of workplace. You will need to modify the form accordingly.]

Date: [enter date]

Name of person conducting the inspection: [enter names]

Work location evaluated: [enter information]

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Ventilation* (amount of fresh air and filtration maximized)			
Additional room air filtration*			
[Add any additional controls your workplace is using]			
Administrative			
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			
[Add any additional Controls your workplace is using]			

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
[Add any additional controls your workplace is using]			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
[Add any additional controls your workplace is using]			

\*Identify and evaluate how to maximize ventilation with outdoor air; the highest level of filtration efficiency compatible with the existing ventilation system; and whether the use of portable or mounted HEPA filtration units, or other air cleaning systems, would reduce the risk of COVID-19 transmission. Review applicable orders and guidance from the State of California and local health departments related to COVID-19 hazards and prevention have been reviewed, including the CDPH Interim Guidance for Ventilation, Filtrations, and Air Quality in Indoor Environments and information specific to your industry, location, and operations. We maximize the quantity of outside air provided to the extent feasible, except when the United States Environmental Protection Agency (EPA) Air Quality Index is greater than 100 for any pollutant or if opening windows or maximizing outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.

# **Appendix C: Investigating COVID-19 Cases**

All personal identifying information of COVID-19 cases or persons with COVID-19 symptoms, and any employee required medical records will be kept confidential unless disclosure is required or permitted by law. Un-redacted information on COVID-19 cases will be provided to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH) immediately upon request, and when required by law.

Date: [enter date COVID-19 case - suspected/confirmed - became known to the employer]

Name of person conducting the investigation: [enter name]

Name of COVID-19 case (employee or non-employee\*) and contact information: [enter information]

Occupation (if non-employee\*, why they were in the workplace): [enter information]

\*If we are made aware of a non-employee COVID-19 case in our workplace

Names of employees/representatives involved in the investigation: [enter information]

Date investigation was initiated: [enter information]

Locations where the COVID-19 case was present in the workplace during the high-risk exposure period, and activities being performed: [enter information]

Date and time the COVID-19 case was last present and excluded from the workplace: [enterinformation]

Date of the positive or negative test and/or diagnosis: [enter information]

Date the case first had one or more COVID-19 symptoms, if any: [enter information]

Information received regarding COVID-19 test results and onset of symptoms (attach documentation): [enter information]

Summary determination of who may have had a close contact with the COVID-19 case during the high-risk exposure period. Attach additional information, including:

- The names of those found to be in close contact.
- Their vaccination status.
- When testing was offered, including the results and the names of those that were exempt from testing because.
  - They were fully vaccinated before the close contact and do not have symptoms.
  - They returned to work per our return-to-work criteria and have remained symptom free for 90 days or, for those that never developed symptoms, for 90 days after the initial positive test.
- The names of those that were excluded per our Exclusion of COVID-19 Cases and Employees who had a "Close Contact" requirements.
- The names of those exempt from exclusion requirements because:
  - They were fully vaccinated before the close contact and did not develop COVID-19 symptoms.
  - They returned to work per our return-to-work criteria and have remained symptom free for 90 days or, for those that never developed symptoms, for 90 days after the initial positive test.

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:

- 1. All employees who were in close contact
- 2. Their authorized representatives (If applicable, the notice required by Labor Code section 6409.6(a) (2) and (c))

Names of employees that were notified:	Names of their authorized representatives:	Date

Independent contractors and other employers present at the workplace during the high-risk exposure period.

Names of individuals that were notified:	Date

What were the workplace conditions that could have contributed to the risk of COVID-19 exposure? [enter information]

What could be done to reduce exposure to COVID-19? [enter information]

Was local health department notified? Date? [enter information]

# Multiple COVID-19 Infections and COVID-19 Outbreaks

[This addendum will need to be added to your CPP if three or more employee COVID-19 cases within an exposed group visited the workplace during their high-risk exposure period at any time during a 14-day period. Reference section 3205.1 for details.]

This addendum will stay in effect until there are no new COVID-19 cases detected in the exposed group for a 14-day period.

#### **COVID-19 testing**

- We provide COVID-19 testing at no cost to all employees, during paid time, in our exposed group except for:
  - o Employees who were not present during the relevant 14-day period.
  - Employees who were fully vaccinated before the multiple infections or outbreak and who do not have symptoms.
  - COVID-19 cases who did not develop symptoms after returning to work pursuant to our returnto- work criteria, no testing is required for 90 days after the initial onset of symptoms or, for COVID-19 cases who never developed symptoms, 90 days after the first positive test.
- COVID-19 testing consists of the following:
  - All employees in our exposed group are immediately tested and then again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine, isolation, or exclusion period required by, or orders issued by, the local health department.
  - After the first two COVID-19 tests, we continue to provide COVID-19 testing once a week of employees in the exposed group who remain at the workplace, 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 provide additional testing when deemed necessary by Cal/OSHA.

We continue to comply with the applicable elements of our CPP, as well as the following:

- 1. Employees in the exposed group wear face coverings when indoors, or when outdoors and less than six feet apart (unless one of the face-covering exceptions indicated in our CPP apply).
- 2. We give notice to employees in the exposed group of their right to request a respirator for voluntary use if they are not fully vaccinated.
- We evaluate whether to implement physical distancing of at least six feet between persons, or where six feet of physical distancing is not feasible, the need for use of cleanable solid partitions of sufficient size to reduce COVID-19 transmission.

### COVID-19 investigation, review, and hazard correction

We 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 is documented and includes:

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.
  - o Insufficient air filtration.
  - Lack of physical distancing.

- Updating the review:
  - Every thirty days that the outbreak continues.
  - o 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 consider:
  - Moving indoor tasks outdoors or having them performed remotely.
  - o Increasing outdoor air supply when work is done indoors.
  - Improving air filtration.
  - o Increasing physical distancing as much as feasible.
  - o Requiring respiratory protection in compliance with section 5144.
  - [Describe other applicable controls].

# 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, 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, if so, implement their use to the degree feasible.

# Major COVID-19 Outbreaks

[This addendum will need to be added to your CPP should 20 or more employee COVID-19 cases in an exposed group visit your workplace during the high-risk exposure period within a 30-day period. Reference section 3205.2 for details.]

This addendum will stay in effect until there are fewer than three COVID-19 cases detected in our exposed group for a 14-day period.

We continue to comply with the Multiple COVID-19 Infections and COVID-19 Outbreaks addendum, except that the COVID-19 testing, regardless of vaccination status, is made available to all employees in the exposed group twice a week, or more frequently if recommended by the local health department.

In addition to complying with our CPP and Multiple COVID-19 Infections and COVID-19 Outbreaks addendum, we also:

- Provide employees in the exposed group with respirators for voluntary use in compliance with section 5144(c)(2) and determine the need for a respiratory protection program or changes to an existing respiratory protection program under section 5144 to address COVID-19 hazards.
- Separate by six feet (except where we can demonstrate that six feet of separation is not feasible and there is momentary exposure while persons are in movement) any employees in the exposed group who are not wearing respirators required by us and used in compliance with section 5144. When it is not feasible to maintain a distance of at least six feet, individuals are as far apart as feasible. [Describe methods used, such as physical distancing that includes: telework or other remote work arrangements; 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; and adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.]
- Install cleanable solid partitions that effectively reduce transmission between the employee and other
  persons at workstations where an employee in the exposed group is assigned to work for an extended
  period, such as cash registers, desks, and production line stations, and where the physical distancing
  requirement (described above) is not always maintained.
- Evaluate whether to halt some or all operations at the workplace until COVID-19 hazards have been corrected.
- Implement any other control measures deemed necessary by Cal/OSHA.