

Wright Elementary School District COVID-19 Prevention Program (CPP)

Requirements

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)). The Wright Elementary School District has used the model developed by Cal/OSHA on creating our own unique CPP tailored to our workplace.

Cal/OSHA encourages employers to engage with employees in the design, implementation and evolution of their COVID-19 Prevention Program. A draft of this plan was sent to union leadership on January 12, 2021 and was discussed with them on January 20, 2021.

Districts, as 'other employers', are required to comply with the following:

- All of the elements that may be required in the following CCR, Title 8 sections, including:
 - 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
 - ??Which of the four **Additional Considerations** provided by OSHA to see which are applicable
- Additional guidance materials available at www.dir.ca.gov/dosh/coronavirus/



COVID-19 Prevention Program (CPP) for the Wright Elementary School District

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

Board Approval Date: January 21, 2021

Authority and Responsibility

The District Superintendent has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

All employees are responsible for using safe work practices, following all directives, policies and procedures, and assisting in maintaining a safe work environment.

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace.

- Conduct workplace-specific evaluations using the [Sonoma County Schools Reopening Checklist](#) and **Appendix A: Identification of COVID-19 Hazards** form.
- Evaluate employees' potential workplace exposures to all persons at, or all 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

- 1) **Creating the Plan:** During the summer of 2020, a district task force with 17 members including administrative, certificated, and classified employees met multiple times to develop our Return to School Plan for the 2020-21 school year. That plan (approved by the Board of Trustees in July 2020) informed the development of the CCP
- 2) **Identification, Evaluation, and Communication of Hazards:** Employees and their authorized employees' representatives (WESD, CSEA) are encouraged to participate in the identification and evaluation of COVID-19 hazards by ensuring the following are in place:
 - **Face Coverings:** Ensuring that they, their colleagues, students and parents wear a face covering as required
 - **Social Distancing:** Ensuring that they, their colleagues, students and parents maintain the required social distance
 - **Hand Sanitation:** Ensuring that they and their students wash and/or sanitize hands frequently and report any work stations or restrooms when they run out of hand soap and sanitizer
 - **Boundaries:** Respecting the boundaries of others by not entering their work spaces without permission
 - **Hazards:** Report to their principal any hazards such as unclean work spaces, windows that don't open, HVAC systems that don't appear to be working properly

- Self-Quarantining when required following travel, potential exposure

Employee screening

Self-Screening as a Condition of Working on Campus: Employees self-screen upon arrival at work—they sign in online to verify that they have not had symptoms or exposure to COVID per CDPH guidelines. When necessary, face coverings are used during screening by employees and non-contact thermometers are used. Should a screener be needed, the screener must wear an N95, KN95, or similar protective face covering. Each site has contact free thermometers for employee screening.

Employee Testing: The District has contracted with Curative to provide weekly testing for employees when we return to on-site instruction. Individual employees will be tested as frequently as, or more frequently than, the requirements at the time. The District Office will keep a log of employee testing.

Correction of COVID-19 Hazards

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

The severity of the hazard will be assessed by site or district administration and correction time frames assigned, accordingly. The Superintendent will be notified within 24 hours of any reported hazard at a school.

Individuals are identified (typically the Director of Maintenance and Operations or the school principal) as being responsible for timely correction.

Follow-up measures are taken to ensure timely correction, include a requirement to sign off and date on Appendix B when the correction has been made.

Control of COVID-19 Hazards

Physical Distancing

We ensure at least six feet of physical distancing at all times in our workplace by:

- Eliminating the need for workers to be in the workplace – e.g., telework or other remote work arrangements for many classifications.
- 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 (where practicable).
- Staggered arrival, departure, work, and break times as possible by job classification
- Adjusted work processes or procedures, such as allowing greater distance between employees that must work on campus (custodial, maintenance, food service).
- Reference section 3205(c)(6) for details]

Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved. Plexiglass barriers are used in school and district offices for this purpose.

Face Coverings

Employees may use their own face coverings or district provided face coverings. Clean, undamaged face coverings in sufficient quantity have been delivered to each workplace. Face coverings are required to be worn by employees, covering 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. Anyone not wearing a face covering will be provided one. Failure to comply results in being asked to leave the campus. In addition, the district has provided a face shield to be worn over a face covering for added protection. The shield comes with 10 replacement shields to facilitate cleaning.

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, if indoors, outside air supply to the area 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 via the interactive process per the employee's doctor's recommendations.
- 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: Plexiglass partitions were created and installed for each office and for student testing stations.

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

- Ensuring that the windows open properly. For circumstances where the amount of outside air needs to be minimized due to other hazards, such as heat and wildfire smoke, filters will be changed as needed and an air purifier will be provided.
- The ventilation system is properly maintained and adjusted. Ventilation systems have been checked to be in working order and will be monitored for proper operation. WESD will continue to replace all Heating, Ventilation & Air Conditioning (HVAC) filters on the regular replacement cycle.
- To minimize the risk of waterborne illnesses, steps have been taken to ensure that all water systems and features (e.g., sink faucets, drinking fountains) are safe to use after the prolonged facility shutdown. Exterior drinking fountains have been turned off or removed. Classroom drinking fountains will be cleaned and sanitized regularly, but staff and students will be encouraged to bring their own water to minimize the use and touching of water fountains.

Cleaning and disinfecting

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

- Ensuring adequate supplies and adequate time for cleaning to be done properly.
- Informing the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection.
- Purchasing and using of a disinfecting fogger for classroom and workspace sanitation,

Should we have a COVID-19 case in our workplace, we will implement the following procedures: We will avoid use of the room, if possible, during the high risk exposure period. Following that, trained maintenance personnel will clean the rooms with the outlined procedures, including the use of the following as needed by item and location:

- 1) The fogger will be used.
- 2) Surfaces, shared tools, equipment, will be wiped down

Cleaning Schedule:

Schedules will be set up to provide for cleaning and disinfecting during the day and to provide increased cleaning and disinfecting due to COVID. Schedules will be shared with all stakeholders. Below is a sample schedule.

- Classrooms: Daily disinfecting by custodians
- Offices: Daily disinfecting by custodians
- Indoor/Outdoor Common Areas: Daily disinfecting by custodians
- Restrooms: Disinfecting three times daily by custodians

A complete disinfecting will occur in the room(s) where a positive COVID-19 case was reported. This will

include all the exposed and potentially exposed office/work areas on the site, as well as the restrooms and shared spaces. For disinfecting, the trained custodial staff will use an electrostatic fogger with CDC recommended disinfecting solution.

Shared tools, equipment and personal protective equipment (PPE)

PPE must not be shared, e.g., gloves, goggles and face shields.

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by the user with disinfectant wipes or soap and water.

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

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Evaluate handwashing facilities to ensure they are clean and contain the proper supplies in sufficient quantities.
- Determine the need for additional facilities.
- Encourage and allow time for employee handwashing.
- Provide employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Encourage employees to wash their hands for at least 20 seconds each time.
- Provide hand sanitizer that contains at least 60% alcohol in classrooms and offices if soap and water are not readily available. Children under 9 years old should use hand sanitizer under adult supervision. The District has purchased and received an adequate supply of hand sanitizer, with 70% alcohol content, for all classrooms and offices at every district site.
- Encourage staff and student to cover coughs and sneezes with a tissue. Used tissues should be thrown in the trash and hands washed immediately with soap and water for at least 20 seconds. If soap and water are not available, hand sanitizer should be used.

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) for details on required respirator and eye protection use.]

We provide and ensure use of eye protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material.

Investigating and Responding to COVID-19 Cases

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

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

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

System for Communicating

Our goal is to ensure that we have effective two-way communication with our employees, in a spreadsheet (Appendix F) they can readily understand, and that it includes the following information:

- Who employees should report COVID-19 symptoms and possible hazards to, and how
- 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, employees can still access free COVID-19 testing through their health care provider. Testing is free for essential workers.
- In the event we are required to provide accelerated 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. Testing will be accomplished at no cost to the employee during working hours, including when the testing is in response to CCR Title 8 section 3205.1, Multiple COVID-19 Infections and COVID-19 Outbreaks, as well as section 3205.2, Major COVID-19 Outbreaks.
- Information about COVID-19 hazard 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.
- When there is a work exposure, possibly affected employees will be notified via the letter in Appendix E which will be emailed to them. They may also receive a phone call and or text.

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.
- Training is conducted via the Target Solutions COVID-19 module

Appendix D: COVID-19 Training Roster will be used to document this training.

Exclusion of COVID-19 Cases

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 10-14 days after the last known COVID-19 exposure to a COVID-19 case, per CDPH guidelines.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be

accomplished by the ability to work remotely for most positions, employer-provided employee sick leave benefits, payments from public sources or other means of maintaining earnings, rights and benefits, where permitted by law and when not covered by workers' compensation.

- Providing employees at the time of exclusion with information on available benefits.

Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use the Appendix C: Investigating COVID-19 Cases form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
 - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
 - COVID-19 symptoms have improved.
 - At least 10 days have passed since COVID-19 symptoms first appeared.
 - COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
 - A negative COVID-19 test will not be required for an employee to return to work.
 - If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.
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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

Appendix B: COVID-19 Inspections

This link www.dir.ca.gov/dosh/coronavirus/ offers additional guidance on what to regularly inspect

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			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Administrative			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
PPE (not shared, available and being worn)			
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.

Date: [enter date]

Name of person conducting the investigation: [enter name(s)]

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):	

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

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

Appendix D: COVID-19 Training Roster: All employees were trained via the Target Solutions Covid 19 Training Module for 2020-21. Records are kept in the District Office. For 2021-22, this form will be completed when training occurs.

Date: **[enter date]**

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

Employee Name	Signature

Appendix E:

[LETTERHEAD]

**CONFIDENTIAL INFORMATION ENCLOSED
DO NOT DISSEMINATE**

[Date]

Via Email

Attn.: [Name of Labor Relations Representative]

Bargaining Unit: [i.e. CSEA or CTA]

Email: [insert email address]

Re: AB 685 Notice to Labor Union Within One Day of Employee Incident Report for Potential Exposure to COVID-19

Dear [Name of Labor Relations Representative]:

In accordance with California Labor Code section 6409.6, this shall serve as the [District's/COE's] notice of potential COVID-19 exposure of one or more bargaining unit members. As required by law, the following information is provided to the extent it is known. **This notice contains confidential health information of one or more employees and must be kept confidential to the extent required by law.**

Employee's name:

Job title:

Date of injury or onset of illness: [i.e. date of specimen collection resulting in positive test]

Where the event occurred: [e.g., "Unknown," "Room 210," etc.]

Most serious result for employee: [e.g., Quarantine order, symptoms of COVID-19, death, etc.]

Number of days employee was away: [e.g. "Quarantine order for 14 days," "Quarantined for unknown period of time.]"

Classification of Injury or Illness:

Death Absence from Work Job Transfer "Other recordable cases"

Number of days injured employee was:

Unable to Work: _____ Working on restricted basis _____

Thank you for your attention to this matter.

[Signature]

[Name, Title]

Encl.: Notice of Available Benefits; Disinfection and Safety Plan

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**.