# COVID-19 Prevention Program (CPP) for Granada Preparatory School (GPS)

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

Date: Jan. 29, 2021

# **Authority and Responsibility**

Peter Metzger, Head of School, has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all administrative staff 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.

# **GPS Pandemic Response Plan**

All employees are encouraged to read the "GPS Pandemic Response Plan" for school policies and plans re. COVID-19. The Pandemic Response Plan is posted on the school website or is available upon request from the office.

# **Identification and Evaluation of COVID-19 Hazards**

We will implement the following in our workplace:

- Conduct workplace-specific evaluations using the Appendix A: Identification of COVID-19
   Hazards form.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California,
   Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the Appendix B: COVID-19 Inspections form as needed to
  identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to
  ensure compliance with our COVID-19 policies and procedures.

## **Employee participation**

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by sharing any concerns or questions with their supervisor or the Head of School.

## **Employee screening**

We screen our employees by having employees self-screen upon arrival on campus by taking their temperature and answering all screening questions in the "COVID-19 Daily Screening Sheets" log book located in the staff room.

## **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 and correction time frames assigned, accordingly, by the Head of School or a delegated administrative staff member. Correction measures will be assigned to an appropriate staff member (usually the Maintenance Staff). The Inspection Form will be reviewed for completion and kept as a record in the office.

# **Control of COVID-19 Hazards**

# **Physical Distancing**

Where possible, we ensure at least six feet of physical distancing at all times in our workplace by:

- Eliminating the need for workers to be in the workplace e.g., telework or other remote work arrangements as feasible.
- Reducing the number of persons in an area at one time, including visitors.
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Staggered arrival, departure, work, and break times.

Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

## **Face Coverings**

As needed, we provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department. If a face covering is needed, disposable and reusable face coverings for both children and adults are located in the staff room near the first aid supplies. Should anyone on campus (staff or visitor) not be wearing a face mask, they are to be instructed to don one immediately (either their own or one from the school's supplies).

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 are face shields with a drape.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall not enter any building on campus that is occupied by another person, and shall maintain 6-plus fee distance from all others outdoors.

## **Engineering controls**

We implement the following measures for situations where we cannot maintain at least six feet between individuals: Plexiglass barriers are installed.

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

- The ventilation system will be properly maintained and adjusted by the maintenance staff.
- Windows and doors will be opened when feasible to maximize fresh air.

# Cleaning and disinfecting

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

• Cleaning is provided by an outside janitorial service: Breakroom, restrooms, student-occupied classrooms, front office receive daily cleaning.

Additional cleaning supplies for staff use are available in the office.

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

 An outside professional service will be hired to clean and sanitize all exposed work or classroom areas and equipment that has been exposed.

# 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 use of disinfectant wipes or spray that have been distributed to all areas of the campus. Additional supplies are available in the office.

## Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Have existing restrooms and newly created handwashing stations stocked with soap, paper towels, and waste baskets.
- Will re-evaluate handwashing facilities needs as required or requested.
- Employees are encouraged to take the time to wash their hands properly (at least 20 seconds) and frequently.
- Supply all work areas with proper hand sanitizer (those that are approved for external use only).
- All staff have had professional development training via video classes on proper COVID-19 hygiene.

# Personal protective equipment (PPE) used to control employees' exposure to COVID-19

We evaluate the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, and provide such PPE as needed.

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

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

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

- Offered COVID-19 testing at no cost during their working hours via free county testing sites. Staff may elect to obtain testing at other sites at their own expense.
- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to them by our Business Manager.

# **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 with COVID-19 symptoms and/or exposure and/or who have noticed on-campus exposure hazards should immediately notify their supervisor and the Head of School by phone or text (email is not as quick to be received, and so phone or text is to be used).
- 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 include the ability to work from home as feasible.
- Where testing is not required but is desired, employees can access COVID-19 testing through the free County test sites or from their own provider at their own expense.
- 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. Testing is available at no cost from the free County testing sites, and employees will be permitted to obtain the test during work hours. If exposure requires that employees quarantine at home, they will do so without fear of reprisal. Employees are to speak to the Business Manager regarding pay and benefits during quarantine.

- Because our campus is shared to some extent with the First Presbyterian Church, we coordinate
  with them to mitigate any COVID-19 exposure hazards. Should an employee note any exposure
  hazards as a result of the shared campus use, they are to communicate their concerns to their
  supervisor or the Head of School. The school will immediately address such concerns to mitigate
  any exposure hazards.
- The school's Pandemic Response Plan is available to all employees on the school's website or upon request at the office.

# **Training and Instruction**

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
  - o COVID-19 is an infectious disease that can be spread through the air.
  - 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.
- These topics are all covered in the Professional Development video training on COVID-19 that all employees have taken. If an employee has any questions, they should ask their supervisor, the Head of School, or Business Manager for clarification.

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 days after the last known COVID-19 exposure to a COVID-19 case (or longer if the exposed worker becomes symptomatic or tests positive).
- 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. Our Business Manager will ensure all rights and benefits are provided to the employee according to current

- regulations.
- 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.
- Report all school-related cases and outbreaks to the Los Angeles Dept. of Public Health for contact tracing.

## **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.
  - o At least 10 days have passed since COVID-19 symptoms first appeared.
- COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
- A negative COVID-19 test will not be required for an employee to return to work.
- If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 10 days from the time the order to quarantine was effective.

Signed: Hans Peter Metzger, Head of School

Hans Peter Melygon

Date: Jan. 29, 2021

# **Appendix A: Identification of COVID-19 Hazards**

All persons, regardless of symptoms or negative COVID-19 test results, will be considered potentially infectious. Particular attention will be paid to areas where people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not. For example: meetings, entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

Evaluation of potential workplace exposure will be to all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

Person conducting the evaluation: Peter Metzger

Date: Jan. 28, 2021

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

Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards	Places and times	Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers	Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation
In-person teaching (PS, PK, JK, K, 1 <sup>st</sup> grades)	play areas.	Potential exposure may take place during in-person teaching. Teachers and students are affected.	Teachers and students are to maintain cohorts of 14 or fewer to minimize potential exposure.  Doors and windows will be opened as feasible for ventilation.  All individuals present must wear face masks covering the nose and mouth except while eating or drinking.  Handwashing with soap shall take place frequently and thoroughly.  Hand sanitizer is available for use when hand washing is not feasible. Only sanitizer approved for external use on skin is supplied.
Staff or others working in or visiting the office or staff room.	_	Any staff members or visitors may be closer than 6 feet apart at reception, in walkways, and at desks.	-Non-staff visitors are discouraged from entering the buildingStaff are to minimize time spent in close proximity to others while in shared spacesPlexiglass barriers have been installed at the reception counter and in the front office between desks.

Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards	Places and times	Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers	Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation
Staff or others using shared	Shared bathrooms	Shared bathroom facilities may	Bathrooms are cleaned daily,
bathrooms		expose individuals to surface contact.	and additional cleaning supplies are available in the office for use as needed.

**Appendix B: COVID-19 Inspections** 

Date:

Name of person conducting the inspection:

Work location evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Administrative			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles	_		

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

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 testing or related medical services provided by us will be provided in a manner that ensures the confidentiality of employees, with the exception of unredacted information on COVID-19 cases that will be provided immediately upon request to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law.

All employees' medical records will also be kept confidential and not disclosed or reported without the employee's express written consent to any person within or outside the workplace, with the following exceptions: (1) Unredacted medical records provided to the local health department, CDPH, Cal/OSHA, NIOSH, or as otherwise required by law immediately upon request; and (2) Records that do not contain individually identifiable medical information or from which individually identifiable medical information has been removed.

#### Date:

# Name of person conducting the investigation:

Employee (or non- employee*) name:  Location where employee worked (or non-employee was present in the workplace):  Was COVID-19 test offered?  Date and time the COVID-19 case was last present in the workplace:  Date the case first had one or more COVID-19 symptoms:  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):			
employee') name:  Location where employee worked (or non-employee was present in the workplace):  Was COVID-19 test offered?  Date and time the COVID-19 case was last present in the workplace:  Date the case first had one or more COVID-19 symptoms:  Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been exposed (attach who may have been exposed (attach workplace) were in the workplace;  Date investigation was initiated:  Name(s) of staff involved in the investigation:  Date of the positive or negative test and/or diagnosis:  Information received regarding COVID-19 test results and onset of symptoms (attach documentation):	Employee (or non-		
Location where employee worked (or non-employee was present in the workplace):  Was COVID-19 test offered?  Date and time the COVID-19 case was last present in the workplace:  Date the case first had one or more COVID-19 symptoms:  Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been exposed (attach additional workplace)  Date investigation was initiated:  Name(s) of staff involved in the investigation:  Date of the positive or negative test and/or diagnosis:  Information received regarding COVID-19 test results and onset of symptoms (attach documentation):	`		
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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:			
	Date:	•	
All employees who may have had COVID- 19 exposure and their authorized representatives.	Names of employees that were notified:		
	Date:		
Independent contractors and other employers present at the workplace during the high-risk exposure period.	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:	

<sup>\*</sup>Should an employer be made aware of a non-employee infection source COVID-19 status.

# **Appendix D: COVID-19 Training Roster**

**Date:** Offered to all employees in September 2020 to be completed by Sept. 25, 2020 (new hires complete training in the first few days of employment).

Person that conducted the training: Video training from "Safe Schools Online"

Employee Name	Signature
Kaila Akbaroff	
Caryn Allen	
Sara Allen	
Gina Boulanger	
Tom Boulanger	
Paulette Collins	
Erica Fonvergne	
Donna Furukawa	
Mary Gendler	
Pam Green	
Lee Ignacio	
Zena Mauro	
Jessica McClure	All employees listed completed the online training from Safe Schools Online. Verified by Kaila Akbaroff, Business Manager.
Claudia Mejia	
Christopher Mendoza	
Peter Metzger	
Gioconda Mitas	
Dolly Perillo	
Juliana Price	
Jennifer Ramirez	
Jed Serrano	
Carol Shibel	
George Silva	
Sandra Veigel	
Cathy Weinstein	

## 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 at free County Test Sites.
- 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 (at free County Test Sites) 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 (at free County Test Sites) 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.
  - o Insufficient outdoor air.
  - 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 will consider:
  - Moving indoor tasks outdoors or having them performed remotely.
  - o Increasing outdoor air supply when work is done indoors.
  - Improving air filtration.
  - Increasing physical distancing as much as possible.

# 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 via the free County Test Sites.

#### **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 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**.