

COVID-19 Prevention Program (CPP) Harmony Union School District

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

Authority and Responsibility

Superintendent Matthew Morgan 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.

Date: January 27, 2021

Title of Management Representative:

Matthew Morgan, Superintendent Harmony Union School District

Signature: _____

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. An electronic submission option will be made available to staff.
- 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:

- Reporting the employee's presentation of COVID-19 symptoms and the employee's possible COVID-19 close contact exposures.
- Using district supplied tracking tools for symptom and contact tracking.
- Reporting any identified COVID-19 hazards to their supervisor immediately.
- Following all Face Covering, Physical Distancing, Sanitization and Cleaning protocols (as described below).
- Self-Quarantining when required following travel, potential exposure

Employee Screening

We screen our employees by:

- All employees shall self-screen for COVID-19 symptoms prior to reporting to the worksite according to CDPH guidelines by filling out the "Wellness Check" form to screen themselves for symptoms (including taking their temperature) and verify that they have not had symptoms or exposure to COVID-19.
- If screening onsite is necessary, face coverings are used during screening by both screeners and employees and, if temperatures are measured, non-contact thermometers are used

- Symptom check protocols will be provided for both students and staff prior to and/or when arriving on campus. Student temperatures check will be taken at school with a no-touch thermometer (students with a fever of 100.0 or higher should stay home or may be sent home pending symptoms).

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 superintendent.
- The superintendent and principal will be responsible for ensuring timely correction typically by the maintenance staff.
- The superintendent will ensure all follow-up measures are taken to ensure timely correction.
- Appendix B:COVID-19 Inspections form will assist in ensuring who is in charge of the action and the date that it was corrected

Controls 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 when appropriate.
- 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 as possible.
- Adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees. 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.

Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six

feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department.

Employees may use their own face coverings or district provided face coverings. Employees are responsible for cleaning their face coverings. The district will provide clean face coverings as needed/requested.

The policy is that if an employee encounters a non-employee that is not wearing a face covering accordingly should remind the non-employee by politely reminding the individual of the required face covering either verbally and/or by pointing to posted campus signage. If these reminders are not effective, the employee will notify the school office immediately.

The following are exceptions to the use of face coverings in our workplace:

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
- Employees wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.
- As otherwise defined by the CDPH.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19.

Engineering controls

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

- At fixed work locations where it is not possible to maintain the physical distancing requirement at all times, the District shall install cleanable solid partitions that effectively reduce aerosol transmission between the employees and other persons.
- We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by:
- Ensure ventilation systems operate properly and increase the circulation of outdoor air as much as possible (opening windows/doors as needed).

- Ensure air filtration is active including ionization on HVAC and separate available filtration units.
- 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 if deemed necessary.
- The ventilation system is properly maintained and adjusted. We provide Enhanced Heating Ventilation and Air Conditioning (HVAC) System: Filtered indoor air filtration in all classrooms and HVAC protocols to optimize outdoor-routine air filtration and flow HVAC filters will be on a regular cleaning and replacement cycle.

Cleaning and disinfecting

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

- Ensuring adequate supplies and adequate time to properly clean and disinfect.
- Informing the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection
- Frequently touched surfaces (playground equipment, door handles, sink handles, drinking fountains) will be cleaned daily or between use as much as possible. Only cleaning products listed on the EPA approved list for use against COVID-19 will be used
- Proper PPE (disposable gown, gloves, eye protection, and mask or respirator) will be provided to classified staff engaged in cleaning and disinfecting.
- Custodians will follow a routine cleaning and disinfection schedule.
- Non-approved cleaning products will not be used near children. Staff will ensure that there is adequate ventilation when using these products
- Routine wiping of high-traffic areas, where additional custodial staffing was added/trained to employ varying disinfectant approaches/treatments (List N/EPA approved)
- Daily secondary disinfectant approach to ensure all surfaces/equipment are disinfected daily in a safe/ EPA (List N/ SARS-COVID 19 approved) COVID compliant manner (non-pesticide): Electric-Static Charge disinfectant sprayers (3), UV-C lighting units (hospital grade) (2)

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:

- Either the fogger, steamer, UV light or soap and water cleansing as indicated by the item Other notes
- Discourage sharing of items that are difficult to clean or disinfect
- Keep each child's belongings separated from others' and in individually labeled containers, cubbies, or areas
- Ensure adequate supplies to minimize sharing of high touch materials to the extent possible (e.g., assigning each student their own art supplies, equipment) or limit use of supplies and equipment by one group of children at a time and lean and disinfect between use
- Avoid sharing electronic devices, toys, books, and other games or learning aids
- All students/staff will be provided with a complimentary, school-spirit water bottle
- Shared objects (gym or physical education equipment, art supplies, toys, games) will be limited and regularly disinfected
- PE/recess equipment will be used with one cohort/group at a time and disinfected daily
- Students will be provided with a container/pouch and an AVID study binder to store all necessary materials (Pencils, pens, crayons, glue stick, reference /study materials, etc)
- Students will be assigned their own electronic device if used in the classroom and one will be provided for them in the event of Distance Learning

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).
- Encouraging employees to wash their hands for at least 20 seconds each time

Notes:

- Students will be required to wash their hands with soap and water for at least 20 seconds, or use hand sanitizer with at least 60% alcohol at the following times: upon arrival at school (use hand sanitizer if there is no sink in the classroom), after being outside for physical activity; before and after break and lunch; prior to leaving school for home and; after sneezing, coughing, or nose blowing.
- Handwashing/hygiene signs will be placed in all school bathrooms, to promote proper handwashing by students and staff
- Staff will be provided personal hand sanitizer to carry with them as needed

- Workers or other persons handling or serving food must use gloves in addition to face coverings. Employers should consider where disposable glove use may be helpful to supplement frequent handwashing or use of hand sanitizer; examples are for workers who are screening others for symptoms or handling commonly touched items.

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 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.

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 scientific nature of COVID as a communicable virus 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 doesn't 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.
- Specific training modules include:
 - Protective Measures for all
 - What to do if a child is sick
 - Cleaning/Disinfectant
 - Handwashing
 - Tissues
 - Staying home/returning to school
 - Food handling protocols
- Appendix D: COVID-19 Training Roster will be used to document this training.

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 repeated 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.

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

- Any students or staff exhibiting symptoms should immediately be required to wear a face covering and be required to wait in an isolation area until they can be transported home or to a healthcare facility.
- Sick staff members or students should not return until they have met CDC's criteria to discontinue home isolation
- Immediately separate staff and children with COVID-19 symptoms (such as fever, cough, or shortness of breath) at school. Individuals who are sick should go home or to a healthcare facility depending on how severe their symptoms are, and follow CDC guidance for caring for oneself and others who are sick.
- Work with school administrators, nurses, and other healthcare providers to identify an isolation room or area to separate anyone who has COVID-19 symptoms, or who tests positive but does not have symptoms. School nurses and other healthcare providers should use Standard and Transmission-Based Precautions when caring for sick people.
- Safely transport anyone who is sick to their home or to a healthcare facility. If you are calling an ambulance or bringing someone to the hospital, try to call first to alert them that the person may have COVID-19.
- Close off areas used by a sick person and do not use these areas until after cleaning and disinfecting

- Wait at least 24 hours before cleaning and disinfecting. If 24 hours is not feasible, wait as long as possible.
- Ensure safe and correct use and storage of cleaning and disinfection products, including storing products securely away from children.
- In accordance with state and local laws and regulations, school administrators should notify local health officials, staff, and families immediately of any case of COVID-19 while maintaining confidentiality as required by state and federal laws including the Americans with Disabilities Act (ADA) and HIPAA. See below for Sonoma County protocol.
- Inform those who have had close contact with a person diagnosed with COVID-19 to stay home and self-monitor for symptoms, and follow CDC guidance if symptoms develop.

System for Communicating

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

Who employees should report COVID-19 symptoms and possible hazards to, and how:

Employees should immediately report COVID-19 symptoms and possible hazards to the district designated COVID 19 Coordinator: Matthew Morgan.

It is essential that the following conditions are maintained:

- Employees can report symptoms and hazards without fear of reprisal.
- Procedures and policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness are followed.

Employee Testing

Where testing is not required, how employees can access COVID-19 testing:

- Testing is available at various places throughout Sonoma County. A complete list can be found at the following website:
<https://socoemergency.org/emergency/novel-coronavirus/testing-and-tracing/>
- In addition, all school employees have access to free testing through West County Health Centers on-site or nearby approximately every 4 weeks or less.

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.

If required to provide testing because of an employee exposure, 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. The District will provide COVID-19 testing through the West County Health Centers testing site at no cost to employees during their working hours to all employees who had potential close contact COVID-19 exposure at the worksite.

- Information about COVID-19 hazards employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures.
- Ongoing communication and emails will be sent to employees related to COVID-19 updates and reminders.

Exclusion of COVID-19 Cases

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days or as advised by CDPH or local Public Health Officer, after the last known COVID-19 exposure to a COVID-19 case.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related.
- At the time of exclusion, the District will provide the excluded employees the information on benefits to which the employees may be entitled under applicable federal, state, or local laws. This includes any benefits available under workers' compensation law, the FFCRA, Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, the District's own leave policies, and leave guaranteed by contract.
- The District will provide these employees with information regarding COVID-19-related benefits to which the employees may be entitled under applicable federal, state, or local laws. This includes any benefits available under workers' compensation law, the federal Families First Coronavirus Response Act (FFCRA), Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, local governmental requirements, the District's own leave policies, and leave guaranteed by contract.
- The District will continue to provide and will maintain these employees' earnings, seniority, and all other employee rights and benefits, including the employees' right to their former job status, as if the employees had not been removed from their jobs.
- The District may require that these employees use employer-provided employee sick leave benefits for this purpose and consider benefit payments from public

sources in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers' compensation.

- Provide 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. Electronic submission will be made available.

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.

Appendix A: Identification of COVID-19 Hazards

All persons, regardless of symptoms, vaccination status 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 working at fixed locations, such as classrooms, offices, and other school work sites.

Person Conducting the Evaluation:

Date:

Name(s) of Employees and Authorized Employee Representative that Participated:

Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards	Places and times
Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers	Existing and/or additional COVID-19 prevention controls, including

Appendix B: COVID-19 Inspections

Date:

Name of Person Conducting the Inspection:

Work Location Evaluated:

ENGINEERING	Status	Person Assigned to Correct	Date Corrected
Barriers/Partitions			
Ventilation (amount of fresh air and filtration maximized)			
Room Air Filtration			

ADMINISTRATIVE	Status	Person Assigned to Correct	Date Corrected
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	Status	Person Assigned to Correct	Date Corrected
Not shared, Available and Utilized			
Face coverings (cleaned sufficiently often)			
Face Shields			
Eye Protection			
Gloves			
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:

Name of Person Conducting the Investigation:

Employee Name (or non- employee*)		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>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</p> <p>(attach additional information):</p>	
---	--

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

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

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

The section applies when 2 or more positive cases are found on campus, This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 testing

- We will provide COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period. COVID-19 testing will be provided at no cost to employees during employees' working hours.
- COVID-19 testing consists of the following:
 - All employees in our exposed workplace will be immediately tested and then tested again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by, the local health department.
 - After the first two COVID-19 tests, we will continue to provide COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
- We will provide additional testing when deemed necessary by Cal/OSHA.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with our CPP Exclusion of COVID-19 Cases and Return to Work Criteria requirements, and local health officer orders if applicable.

Investigation of workplace COVID-19 illness

We will immediately investigate and determine possible workplace-related factors that contributed to the COVID-19 outbreak in accordance with our CPP Investigating and Responding to COVID-19 Cases.

COVID-19 investigation, review and hazard correction

In addition to our CPP Identification and Evaluation of COVID-19 Hazards and Correction of COVID-19 Hazards, we will immediately perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19.

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
 - Our leave policies and practices and whether employees are discouraged from remaining home when sick.

- Our COVID-19 testing policies.
- Insufficient outdoor air.
- Insufficient air filtration.
- Lack of physical distancing.
- Updating the review:
 - Every thirty days that the outbreak continues.
 - In response to new information or to new or previously unrecognized COVID-19 hazards
 - When otherwise necessary.
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We will consider:
 - Moving indoor tasks outdoors or having them performed remotely.
 - Increasing outdoor air supply when work is done indoors.
 - Improving air filtration.
 - Increasing physical distancing as much as possible.
 - Respiratory protection.

Notifications to the local health department

- Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in our workplace, we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- We will provide to the local health department the total number of COVID-19 cases and for each COVID-19 case, the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and North American Industry Classification System code of the workplace of the COVID-19 case, and any other information requested by the local health department. We will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace

Additional Consideration #2

Major COVID-19 Outbreaks

A major COVID outbreak is defined when more than 2 cohorts or 5% of the site population tests positive. 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**.

Additional Consideration #3

COVID-19 Prevention in Employer-Provided Transportation

Assignment of transportation

We will prioritize shared transportation assignments in the following order:

- Employees residing in the same housing unit will be transported in the same vehicle.
- Employees working in the same crew or worksite will be transported in the same vehicle.
- Employees who do not share the same household, work crew or worksite will be transported in the same vehicle only when no other transportation alternatives are possible.

Physical distancing and face coverings

We will ensure that the:

- Physical distancing and face covering requirements of our CPP Physical Distancing and Face Coverings are followed for employees waiting for transportation.
- Vehicle operators and any passengers are separated by at least three feet in all directions during the operation of the vehicle, regardless of the vehicle's normal capacity. Vehicle operator and any passengers are provided and wear a face covering in the vehicle as required by our CPP Face Coverings.

Screening

We will develop, implement, and maintain effective procedures for screening and excluding drivers and riders with COVID-19 symptoms prior to boarding shared transportation.

Cleaning and disinfecting

We will ensure that:

- All high-contact surfaces (door handles, seat belt buckles, armrests, etc.) used by passengers are cleaned and disinfected before each trip.
- All high-contact surfaces used by drivers, such as the steering wheel, armrests, seat belt buckles, door handles and shifter, are cleaned and disinfected between different drivers.
- We provide sanitizing materials, training on how to use them properly, and ensure they are kept in adequate supply.

Ventilation

We will ensure that vehicle windows are kept open, and the ventilation system set to maximize outdoor air and not set to re-circulate air. Windows do not have to be kept open if one or more of the following conditions exist:

- The vehicle has functioning air conditioning in use and the outside temperature is greater than 90 degrees Fahrenheit.
- The vehicle has functioning heating in use and the outside temperature is less than 60 degrees Fahrenheit.
- Protection is needed from weather conditions, such as rain or snow.
- The vehicle has a cabin air filter in use and the U.S. EPA Air Quality Index for any pollutant is greater than 100.

Hand hygiene

We will provide hand sanitizer in each vehicle and ensure that all drivers and riders sanitize their hands before entering and exiting the vehicle. Hand sanitizers with methyl alcohol are prohibited.