



# **COVID SAFETY PLAN (CSP)**

## **PART I**

### **COVID-19 PREVENTION PROGRAM (CPP)**

**COVID-19 Prevention Program (CPP)**  
**Encinitas Country Day School (ECDS)**  
**3616 Manchester Avenue, Encinitas, CA**

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

**Date: January 29, 2021 (update of November 30, 2020 CPP)**

### **Authority and Responsibility**

**ECDS Executive Director and Principal as Chief of Staff**, have overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

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

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

We will implement the following in our workplace:

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

#### **Employee participation**

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: Surveys, Remote Staff Meetings, Participation in one-on-one reviews of individual workspaces

#### **Employee screening**

We screen our employees by: Each employee is directly screened in accordance with CDPH guidelines, prior to entering the school each day. All employees wear face coverings and submit to non-contact thermometer prior to entry.

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

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

Upon first awareness of a potential hazard, personnel in charge of the area of the hazard are authorized to either remove the hazard or remove students and other persons from the potentially hazardous area and report the potential hazard immediately to the Principal and/or Executive Director.

The Principal and Executive Director are responsible for immediate assessment and to timely take the appropriate steps to protect students and staff and remove the hazard.

Once appropriately and timely assessed and addressed the Principal and Executive Director will take steps to assure parents are appropriately informed and staff protocols are reviewed and further training or retraining measures are included in any follow-up.

## **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:

- At risk personnel are offered opportunities to work from home.
- Students are screened and received by school personnel each day and parents remain in their vehicles.
- Visitors are limited and must follow the same protocols as staff and students.
- Visual cues and floor markings are in place to indicate where employees and others should be located or their direction and path of travel.
- Staggered arrival, departure, work, and break times are in place.
- Adjusted work processes or procedures are in place to allow greater distance between employees.
- Social distancing is accomplished within classrooms through desk arrangement, desk partitions, masks, and the addition of outdoor socially distanced workspace adjacent to each classroom. (see \*A.4.4 - HEALTH AND SAFETY POLICY - Coronavirus Disease 2020-21 Prevention/Reopening Plan)
- Reference section 3205(c)(6) for details attached)

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. All employees, students, and visitors are required to wear face coverings while on campus. The school has supply of level 1 medical face masks available when staff, students, or visitors misplace their own or otherwise need one.

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

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.
- In the unlikely event any employee is not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, he/she 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 (such as when students are entering or exiting their classroom or moving from desk to sink to wash hands): Desk sneeze guards, air filtration units, face shields and masks.

We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or

natural ventilation systems by:

Each classroom has a separate heating and air conditioning system that is regularly maintained with filters cleaned or replaced according to manufacturer's direction and/or industry standards. Individual UVC air filters are available for classroom use. Each group is kept separate from other groups. Common areas are sanitized after each group use. Each classroom has access to fresh air through cross ventilation when doors are open. An eight-foot overhang on the back of each classroom affords shelter to allow ventilation to continue year-round. On rare days when temperatures are higher or lower than average, staff can choose from a variety of measures including lighter or heavier clothing, use of fans and filtration, turning on the heat or air conditioning, working out of doors under tents etc.

### **Cleaning and disinfecting**

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

- We have a full-time employee dedicated to regularly sanitize bathrooms, and common areas before and after each use.
- Every employee has access to personal protective supplies (masks, gloves, etc), sanitizing supplies and has been trained on protocols of use.
- The school has purchased equipment to make hypochlorous acid, (a non-toxic anti-viral sanitizer approved for Covid19 by the FDA "N" list), for spray and wipe, and equipment for fogging large areas with hypochlorous acid. The school has developed protocols to assure regular sanitization of our classrooms and campus.
- Hypochlorous acid, soft soap, liquid sanitizer, wipes, and gloves are readily available for staff, student, visitor and teacher use.
- With parent permission, students will be allowed to wipe their own desks using a safe hypochlorous acid solution.
- The school has purchased fogging equipment to assure regular sanitizing of common areas as necessary throughout the day and overnight.
- Teachers are provided gloves and approved sanitizer to sanitize door handles, desks, and equipment as necessary throughout the day.
- Equipment sharing is kept to a minimum and equipment is set aside to be sanitized as necessary before returning to shelves for use by others.
- Classroom materials that are not easily sanitized have been recreated as touch screen programs and will be available to K-2 students on their school issued Chromebooks.
- School indoor and outdoor classrooms, bathrooms and common areas are fog-sanitized nightly and as necessary and safe throughout the day.
- The school is stocked with all needed equipment and supplies to support regular sanitizing within and beyond the classrooms and to ensure teachers and facilities staff have ready access to all necessary personal protective supplies to support their efforts to maintain a safe and healthy environment at ECDS.
- All staff members are aware of the protocols and practices in their workplace.

Should we have a COVID-19 case in our workplace, we will implement the following procedures: If a staff member or student tests positive for COVID-19, and it is determined that his/her group is not presumed exposed, his/her work area will be fogged and thoroughly hand sanitized prior to any further use. If his/her associated group is presumed exposed, the group will be moved to remote learning and the area used by the group will be closed and sanitized by trained sanitizing staff.

### **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 hand disinfected between uses by the person last using the area or equipment and by the person scheduled to use the area or equipment. Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users.

## Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Have evaluated our handwashing facilities. We have a sink/s with appropriate signage as required by health department and supplies in every classroom, in each individual bathroom and bathroom building, and in each administrative building.
- Teachers are trained and students will be instructed in all personal safety protocols, including social distancing, hand washing, covering coughs, disposing of tissues, not touching one's face, wearing facemasks, managing their personal possessions.

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

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

- Teachers are trained and students will be instructed in all personal safety protocols, including social distancing, hand washing, covering coughs, disposing of tissues, not touching one's face, wearing facemasks, managing their personal possessions.
- Prompts for social distancing, hand washing, covering coughs, disposing of tissues, not touching one's face, and proper facemask and face shield use are posted appropriately near sinks, tissue dispensers, and sanitizing supplies in classrooms and bathrooms throughout the campus.
- Teachers and staff members are trained in all Covid-19 protocols applicable to their respective roles at ECDS.
- Teachers and staff members are trained during required staff meetings prior to the start of the school year and refreshed as necessary throughout the school year.
- Accommodations will be made to assure limited English language students and staff receive instruction in their native language.
- Teachers are trained and students are instructed on passing protocols, directional arrows and social distancing markings.
- Staff and Students will wear face coverings as directed in the guidelines for schools as issued by the health department unless a requirement is waived for health reasons or guidelines change.
  - Each teacher will be issued a personal face shield with drape for use in their classroom within guidelines.
  - Each student has been issued a personal face shield.
  - Parents are required to send students with a facemask (that meets their standards for health safety) for their child to wear while on campus and a spare in case one is soiled or lost.
  - All students must wear a face mask (as required in protocols and guidelines) to enter and remain on campus, unless he/she has a health waiver.
  - Guidelines are unclear about whether a face shield with a drape is equivalent to a facemask.
  - Teachers have a supply of facemasks for use when a child loses his/her facemask.
  - The school has purchased face shields for staff and student use and will provide training to assure face shields are used according to published guidelines.

## 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 form they can readily understand, and that it includes the following information:

- Employees should report COVID-19 symptoms and possible hazards to their immediate supervisor, the Principal and the Executive Director in person or via intercom or telephone call immediately, then

email.

- Employees are responsible to report immediately and 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 (whenever possible) an option for remote work.
- ECDS provides opportunities for asymptomatic testing at ECDS expense, throughout the school year. Symptomatic employees are instructed to go to their health care provider or to a specific website to arrange to be tested. If the employee does not have coverage or coverage is denied, ECDS will be billed for testing. Symptomatic employees are required to be cleared prior to returning to the workplace. Clearance may be determined by using their own insurance or the school's testing system.
- In the event ECDS is required to test one or more employees because of a workplace exposure or outbreak, the affected employees' will be informed of the reason for the testing, the possible consequences of a positive test, and the testing will be provided at no expense to the employee. When required to provide testing because of an employee exposure, ECDS has a plan for how this 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 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 are available online and through Human Resources documents posted on our network.
- Employees are timely notified of any COVID-19 cases affecting any group, building or the school in general, and instructed appropriately.

## Training and Instruction

ECDS provides effective training and instruction that includes:

- 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.
- **COVID-19 protocols for movement about campus, within classrooms and in public spaces throughout the campus.**

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

## Exclusion of COVID-19 Cases

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished by continuing employee pay for up to 14 days and moving employee to worker's compensation when/if the work-related absence becomes ongoing and any available public benefits, such as SDI, if needed.
- 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.
- Maintain a record of any submitted logs or records provided to any public agency.

## 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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*Kathleen M. Porterfield*

Kathleen M. Porterfield, Executive Director

## 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: Kathleen M. Porterfield**

**Date: January 29, 2021**

**Name(s) of employee and authorized employee representative that participated: Graeg Lehmann, Principal and staff of each area**

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
All Classrooms	Throughout each school day	Teacher and stable cohort of students	Cross Ventilation, independent HVAC unit, sneeze guards, sanitation, personal prevention measures: handwashing, masks, individual supplies and equipment, face masks, social distancing, outdoor work spaces.
Entrance	Parking lot entrance to Central Promenade	Employee, student, or visitors must be masked and checked prior to entry to campus	Parents are polled and student temp taken prior to exiting vehicle. Once accepted students sanitize hands and enter to proceed along social distanced route to their classroom
Exit	Parking lot entrance to Central Promenade	Employee, student, or visitors must be masked and socially distanced as they stage for pickup	Classes gather under group pop up tent awaiting parent pickup. Parent arrival is announced and students are assisted in getting into their vehicle and belted prior to leaving.
Staff Entry/Exit	Administrative building	All Staff	Staff arrival times are staggered Staff check in masked, temp taken, etc. and sanitize timeclock and as necessary prior to each use.



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
Outdoor Common Areas such as amphitheater, tent classroom or playgrounds	Ampitheater	Music Teacher and students of one cohort at a time	Equipment sanitized between uses. Area fogged prior to each group socially distanced use and after each group use.
Indoor common area such as Art Studio	B3	Art teacher and students of one cohort at a time	Area fogged prior to each group use and after each sneeze guarded and face masked group use.
Indoor use move to out of doors	Library	Librarian and students of one cohort at a time	Books brought on book trucks and distributed by gloved librarian; area fogged prior to each group socially distanced use and after each group use.

## Appendix B: COVID-19 Inspections

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

Date: January 28, 2021

Name of person conducting the inspection: Kathleen M. Porterfield

Work location evaluated: 3616 Manchester Avenue, Encinitas, CA. 92024

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Barriers/partitions	Barriers are effective		
Ventilation (amount of fresh air and filtration maximized)	Fresh air and filtration are maximized		
Additional room air filtration	UVC filtering in common indoor areas		
<b>Administrative</b>			
Physical distancing	implemented		
Surface cleaning and disinfection (frequently enough and adequate supplies)	Frequent sanitizing and supplies are adequate		
Hand washing facilities (adequate numbers and supplies)	Adequate facilities and supplies		
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions	Disinfecting and hand sanitizing solutions are being used according to manufacturer instructions		
<b>Regular fogging of common area throughout the day</b>	Fogging is being diligently carried out		
<b>Nightly fogging throughout</b>	Nightly fogging is being diligently carried out		
<b>PPE (not shared, available and being worn)</b>	PPE is available and being worn		
Face coverings (cleaned sufficiently often)	Face coverings are handled by employees		
Gloves	Glove are available throughout		
Face shields/goggles	Face shields are available. Goggles not necessary		
Respiratory protection	Not necessary		

## 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:**

<b>Employee (or non-employee*) name:</b>		<b>Occupation (if non-employee, why they were in the workplace):</b>	
<b>Location where employee worked (or non-employee was present in the workplace):</b>		<b>Date investigation was initiated:</b>	
<b>Was COVID-19 test offered?</b>		<b>Name(s) of staff involved in the investigation:</b>	
<b>Date and time the COVID-19 case was last present in the workplace:</b>		<b>Date of the positive or negative test and/or diagnosis:</b>	
<b>Date the case first had one or more COVID-19 symptoms:</b>		<b>Information received regarding COVID-19 test results and onset of symptoms (attach documentation):</b>	

**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):**

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

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

## Appendix D: COVID-19 Training Roster

Date: **August 2020**

Person that conducted the training:

Employee Name	Signature

## 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**.

## Additional Consideration #3

### COVID-19 Prevention in Employer-Provided Housing

[This section will need to be added to your CPP if you have workers in employer-provided housing. Reference section [3205.3](#) for details. Employer-provided housing is any place or area of land, any portion of any housing accommodation, or property upon which a housing accommodation is located, consisting of: living quarters, dwelling, boardinghouse, tent, bunkhouse, maintenance-of-way car, mobile home, manufactured home, recreational vehicle, travel trailer, or other housing accommodations. Employer-provided housing includes a “labor camp” as that term is used in title 8 of the California Code of Regulations or other regulations or codes. The employer-provided housing may be maintained in one or more buildings or one or more sites, including hotels and motels, and the premises upon which they are situated, or the area set aside and provided for parking of mobile homes or camping. Employer-provided housing is housing that is arranged for or provided by an employer, other person, or entity to workers, and in some cases to workers and persons in their households, in connection with the worker’s employment, whether or not rent or fees are paid or collected.

- This section does not apply to housing provided for the purpose of emergency response, including firefighting, rescue, and evacuation, and support activities directly aiding response such as utilities, communications, and medical operations, if:
  - The employer is a government entity; or
  - The housing is provided temporarily by a private employer and is necessary to conduct the emergency response operations.
- The requirements below for Physical distancing and controls, Face coverings, Cleaning and disinfecting, Screening, and Isolation of COVID-19 cases and persons with COVID-19 exposure do not apply to occupants, such as family members, who maintained a household together prior to residing in employer-provided housing, but only when no other persons outside the household are present.]

#### Assignment of housing units

We will ensure that shared housing unit assignments are prioritized in the following order:

- Residents who usually maintain a household together outside of work, such as family members, will be housed in the same housing unit without other persons.
- Residents who work in the same crew or work together at the same worksite will be housed in the same housing unit without other persons.
- Employees who do not usually maintain a common household, work crew, or worksite will be housed in the same housing unit only when no other housing alternatives are possible.

#### Physical distancing and controls

We will ensure:

- The premises are of sufficient size and layout to permit at least six feet of physical distancing between residents in housing units, common areas, and other areas of the premises.
- Beds are spaced at least six feet apart in all directions and positioned to maximize the distance between sleepers’ heads. For beds positioned next to each other, i.e., side by side, the beds will be arranged so that the head of one bed is next to the foot of the next bed. For beds positioned across from each other, i.e., end to end, the beds will be arranged so that the foot of one bed is closest to the foot of the next bed. Bunk beds will not be used.
- Maximization of the quantity and supply of outdoor air and increase filtration efficiency to the highest level compatible with the existing ventilation system in housing units.

#### Face coverings

We will provide face coverings to all residents and provide information to residents on when they should

be used in accordance with state or local health officer orders or guidance.

### **Cleaning and disinfection**

We will ensure that:

- Housing units, kitchens, bathrooms, and common areas are effectively cleaned and disinfected at least once a day to prevent the spread of COVID-19. Cleaning and disinfecting shall be done in a manner that protects the privacy of residents.
- Unwashed dishes, drinking glasses, cups, eating utensils, and similar items are not shared.

### **Screening**

We will encourage residents to report COVID-19 symptoms to **[enter name of individual, position, or office]**.

### **COVID-19 testing**

We will establish, implement, and maintain effective policies and procedures for COVID-19 testing of occupants who had a COVID-19 exposure, who have COVID-19 symptoms, or as recommended by the local health department.

### **Isolation of COVID-19 cases and persons with COVID-19 exposure**

We will:

- Effectively isolate COVID-19 exposed residents from all other occupants. Effective isolation will include providing COVID-19 exposed residents with a private bathroom, sleeping area, and cooking and eating facility.
- Effectively isolate COVID-19 cases from all occupants who are not COVID-19 cases. Effective isolation will include housing COVID-19 cases only with other COVID-19 cases, and providing COVID-19 case occupants with a sleeping area, bathroom, and cooking and eating facility that is not shared by non-COVID-19-case occupants.
- Keep confidential any personal identifying information regarding COVID-19 cases and persons with COVID-19 symptoms, in accordance with our CPP **Investigating and Responding to COVID-19 Cases**.
- End isolation in accordance with our CPP **Exclusion of COVID-19 Cases and Return to Work Criteria**, and any applicable local or state health officer orders.

## Additional Consideration #4

### COVID-19 Prevention in Employer-Provided Transportation to and from Work

[This section will need to be added to your CPP if there is employer-provided motor vehicle transportation to and from work, which is any transportation of an employee, during the course and scope of employment, provided, arranged for, or secured by an employer including ride-share vans or shuttle vehicles, car-pools, and private charter buses, regardless of the travel distance or duration involved. Reference section [3205.4](#) for details.]

This section does not apply:

- If the driver and all passengers are from the same household outside of work, such as family members.
- To employer-provided transportation when necessary for emergency response, including firefighting, rescue, and evacuation, and support activities directly aiding response such as utilities, communications and medical operations.]

#### 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 operator 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, seatbelt 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, seatbelt 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 recirculate 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.