COVID-19 Prevention Program (CPP) for Santa Clara County Office of Education (SCCOE)

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

Date: June 30, 2022

Authority and Responsibility

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

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

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Conduct workplace-specific evaluations using the Appendix A: Identification of COVID-19 Hazards form or other authorized 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, school opening form, or other authorized inspection 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.
- Managers who engage independent contractors or other individuals in work on SCCOE worksites shall evaluate potential workplace exposures to all persons that may enter the workplace.

Employee participation

Employees and their authorized employees’ representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

The SCCOE welcomes employees and union representatives to identify COVID-19 hazards that may or may not have been identified by the SCCOE. We need to work together to identify potential hazards that may be undetected. This includes informing supervisors/managers/Human Resources of unidentified potential COVID-19 hazards that are new to the workplace, or existing hazards that are created by those employees who fail to follow guidelines. The SCCOE encourages all employees to actively engage in COVID-19 hazard identification to prevent COVID-19 exposure in the workplace.

Management shall regularly evaluate existing COVID-19 prevention controls in the workplace and the need for different or additional controls.

Employees shall be educated and empowered by management to respectfully remind others to follow all policies, procedures, and practices adopted related to COVID-19. Employees may also report the occurrence to a Supervisor or COVID-19 Warm Line [408-453-6651] to investigate or correct the behavior.
Employee screening

We screen our employees and any visitors to our facilities by:

Employees are required to using an online application sent via text message or email upon implementation of the Qualtrics app. All employees will report whether or not they are working at an SCCOE site that day and complete the symptom self-screening, if necessary. Employees with symptoms will be instructed to stay home and their supervisor will be notified. Employees must follow the CDC guidelines for self-screening at https://www.cdc.gov/coronavirus/2019-ncov/symptoms.

Nurses may actively screen employees upon entering the Ridder Park location who do not have access to Qualtrics. Appropriate face coverings will be used by both employees and nurses during screening using non-contact thermometers (as needed). Employees will complete a paper-version of the Health Screening Form.

Correction of COVID-19 Hazards

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

The severity of the hazard will be investigated and assessed, and correction time frames assigned, accordingly. Interviews with individuals who are familiar with the condition, practice or procedure being inspected may be conducted.

Individuals will be identified as being responsible for timely correction.

Follow-up measures such as check-ins or walk-through visits will be taken to ensure timely implementation of necessary changes.

Control of COVID-19 Hazards

Physical Distancing

Where possible, we ensure an appropriate spacing of individuals in our workplace by:

- Gradually transitioning to in-person working conditions over the course of this academic semester.
- 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.
- Adjusting work processes and procedures to where single individuals perform functions rather than working in pairs.
- Separating furniture or locations where employees perform work tasks.
- Spacing student desks from teacher workstations.
- Use of plexiglass barriers at employee and student workstations (as appropriate).
- Limiting use of break rooms.
- Limiting seats in the conference rooms.
- Observing 'Reduced Maximum Capacity' limits in conference rooms and restrooms.

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, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department. Face coverings will be provided or replaced as needed. Replacements may be located in the classrooms, isolation rooms, Incident Command Center (ICC), and departments will have face covering supplies in their areas. These face coverings are a layer of protection to supplement physical distancing, personal hygiene, and additional cleaning and disinfecting protocols.

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

- When an employee is alone in a room or designated workspace.
- While eating and drinking at the workplace, 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.
- Employees must not wear a face covering if doing so will inhibit job functions. Employees should check with their supervisors to ensure which job functions can and cannot be performed while wearing a face covering.

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 others.

Engineering controls

We implement the following measures for situations where we cannot maintain at least six feet between individuals: Plexiglass, barriers will be installed at locations where it has been determined by job hazard analysis where physical distance cannot be maintained.

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

- Employees shall be informed to keep doors and windows open to the extent feasible.
- Employees will be informed about circumstances where the amount of outside air needs to be minimized due to other hazards, such as heat and wildfire smoke.
- Ventilation systems will receive regular maintenance to ensure cleanliness and functionality.
- Assessments will be conducted to determine the possibility to increase filtration efficiency to the highest level compatible with the existing ventilation systems.
- Filters for ventilation system will be checked and replaced regularly.
- MERV 13 level HEPA filters will be installed if compatible with the ventilation system.
- We will regularly review information on state, local, and CDC public health guidance on air and shall implement recommendations when necessary.
- Portable HEPA filtration units will be provided in school spaces without operable windows.

Cleaning and disinfecting

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

- At least daily, and more frequently if feasible, clean and disinfect frequently touched hard surfaces (e.g., tables, desks, chairs, door handles, light switches, phones, copy/fax machines, bathroom surfaces (toilets, countertops, faucets), drinking fountains, and playground equipment) and shared objects (toys, games, art supplies, books) pursuant to CDC guidance.
- Adequate supplies and adequate time will be given to cleaning and disinfecting to be done properly.
- All employees and authorized employee representatives will be informed of the frequency and scope
of cleaning and disinfection.

- Cleaning and disinfection of areas must be done in a manner that does not create a hazard to employees.
- All staff shall be trained and required to sanitize shared spaces or items. Staff will be properly trained and provided with the appropriate PPE including gloves.

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

- All staff expected to clean and disinfect areas exposed to COVID-19 shall receive specialized training and PPE.
- Areas visited by the ill persons shall be closed off. Open outside doors and windows and use ventilating fans to increase air circulation in the area. Wait 24 hours or as long as practical before beginning cleaning and disinfection.
- Cleaning staff should clean and disinfect all areas such as offices, bathrooms, common areas, shared electronic equipment (like tablets, touch screens, keyboards, remote controls) used by the ill persons, focusing especially on frequently touched surfaces.

**Shared tools, equipment, and personal protective equipment (PPE)**

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

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by the employee. Cleaning/sanitizing materials will be readily available to all employees. Employees will be trained on the proper use of available cleaning products.

**Hand sanitizing**

In order to implement effective hand sanitizing procedures:

- Handwashing facilities will be evaluated to determine if additional facilities are needed.
- Employees will be allowed time for employee handwashing. Additional time will be given for employees to wash hands often.
- Employees shall be provided with information on and encouraged to engage in proper handwashing including washing their hands for 20 seconds.
- Employees will be provided with an effective hand sanitizer and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol). Hand sanitizer will be available in multiple locations.

**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. Where respirator use is required, we will ensure that employees undergo medical evaluations and proper fit testing in accordance with the SCCOE Respiratory Protection Program.

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.

PPE, such as but not limited to gloves, goggles, face coverings, and face shields shall not be shared.
Investigating and Responding to COVID-19 Cases

Investigating and responding to COVID-19 exposure cases will be conducted and documented by trained designees who will also coordinate any required notices to employees who may have been exposed.

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

- Offered COVID-19 testing at no cost during their working hours. Testing may be accomplished on site through SCCOE vendors, at a Santa Clara County testing location, or through the employees’ health provider.
- Provided information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases.

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 immediately report any signs or symptoms of the virus or a positive test result to their supervisor and the designated Human Resources, or COVID-19 Designee. Employees should also similarly immediately inform their supervisor/manager/Human Resources if they believe they have possibly been exposed to any COVID-19 hazard in the workplace. A failure to report may be considered a safety violation, subject to the discretion of the SCCOE. Any employee that reports any of the items above should do so without fear of reprisal. The SCCOE has a strict non-retaliation and non-discrimination policy and will not tolerate anyone retaliating against, discriminating against, or harassing any employee for informing the employer about any of the information in this paragraph.
- The SCCOE has an accommodation policy in its Employee Compliance Handbook which outlines the procedures by which an employee with medical or other conditions may request an accommodation to perform the essential functions of their job during the pandemic. Employees should review this policy and contact Human Resources for more information.
- If there is an event that requires the SCCOE to provide employees with testing, such as if there are multiple COVID-19 cases at the facility, the SCCOE will provide employees with access to testing through Santa Clara County testing centers, SCCOE vendors, or employee’s medical provider. Affected employees will be informed as to why testing is being offered. All tests will be conducted during work hours. Affected employees are expected to inform their supervisor, Human Resources, or their COVID-19 designee that they will be going to take a test.
- The SCCOE will provide employees with notification in accordance with AB 685/California Labor Code § 6409.6 and this policy. Each employee that may have had COVID-19 exposure during a high-risk period will receive notification of the exposure. Personal identifying information of the COVID-19 positive case will not be provided to the employee or any other person unless specifically required by law or regulation. Authorized representatives including will also receive notice of the COVID-19 exposure in accordance with this Policy and AB 685/California Labor Code § 6409.6 The SCCOE will also contact independent contractors or subcontractors that were at the workplace during the high-risk exposure period, who may have had COVID-19 exposure.
- When testing is not required, employees may access their health provider, local testing center, or employer provided testing centers available at school sites. The purpose of voluntary testing is to give employees the tools to get tested to reduce the likelihood of bringing the virus to work.
Training and Instruction

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
  - COVID-19 is an infectious disease that can be spread through the air.
  - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
  - An infectious person may have no symptoms.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19.
- Guidance for cleaning and disinfecting and donning and doffing PPE.
- Stronger Together Public Service Announcements (PSAs) will be used to provide useful information about staying healthy, connected, and safe. Various webinars and zoom staff meetings providing training on ventilation, school reopening, and safe procedures will be offered to staff.

Appendix D: COVID-19 Training Roster may be used to document this training, as well as electronic lists from virtual meetings.

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 in accordance with Cal/OSHA guidelines and/or applicable California Department of Public Health (CDPH) rules.
- Continuing and maintaining an employee’s earnings, seniority, and all other employee rights and benefits whenever we have demonstrated that the COVID-19 exposure is work related. This will be accomplished by the current COVID-19 leave options available such as by employer-provided employee sick leave benefits, payments from public sources or other means of maintaining earnings, rights and benefits, where permitted by law and when not covered by workers’ compensation.
- Providing employees at the time of exclusion with information on available benefits. Employees should contact Human Resources/ Employment Services to discuss leave options and to obtain the appropriate form.

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 information about COVID-19 cases at our workplace to SCCOE’s workers’ compensation claims administrator, pursuant to Labor Code section 3212.88.
- 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.
- Keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
  - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
  - COVID-19 symptoms have improved.
  - After testing negative on or after day 5 with an antigen or PCR test, the individual may return the following day.
  - Or after day 10 with no fever for at least 24 hours (no medication and no test required).
- A negative COVID-19 test will not be required for an employee to return to work after day 10.
- A negative COVID-19 test is required if the individual tests out prior to day 10 of isolation.
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: [enter name(s)]

Date: [enter date]

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

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<tr>
<th>Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards</th>
<th>Places and times</th>
<th>Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers</th>
<th>Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation</th>
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Appendix B: COVID-19 Inspections

Social Distancing Protocols

- The following protocols are posted at the entrance of each facility and provided to all essential employees who must report to work:
  - Do not enter this facility if you have a cough, fever, or any other symptoms related to COVID-19.
  - Masks or face coverings are required at all times while in an SCCOE facility.
- Markings on the ground facilitate physical distancing of six feet or more in the following areas:
  - All school entry and exit points
  - In classrooms
  - Where students or staff are expected to cluster or form lines
- Desk and countertop transparent shields/sneeze guards are provided for additional protection to employees when interacting with visitors.

Daily Screening

- All employees and students have been told not to come to work if sick.
- Adults will complete a daily health screening
- Process for student health screening:

Entrance, Egress and Moving Through the School

- Designate routes for entry and exit.
- Require adults and students entering campus for in-person pick-up or drop-off to wear a face mask or face covering.
- Visitors and volunteers will be restricted to only those who are necessary to enter campus

Promoting Healthy Hygiene Practices

- Signage in high visibility areas to remind students and staff of proper techniques for handwashing, covering of coughs and sneezes, wearing of masks or face coverings and other prevention measures will be posted.
- Adequate supplies of soap, tissues, face coverings and hand sanitizers are provided.
- All persons are encouraged to wash their hands or to use hand sanitizer upon arrival.
  - Hand sanitizing stations set up near the entrances of the campus and in office spaces.
  - Signs posted in restrooms and by hand washing stations with instructions for effective washing.
  - Signs posted with instructions for the use of hand sanitizer.
- An isolation room designated at each school and equipped with appropriate PPE
- Sharing of items is limited
  - Shared items disinfected between uses
- Staff or volunteers distributing meals must wear masks or face coverings and disposable gloves.
- Meals will be served outdoors or in spaces where physical distancing can be maintained. Meals will be plated or bagged to reduce contact and congestion among students to the degree practicable.
- The use of share tables and self-service buffets for food and condiments will be suspended.
- Food service staff will wear a mask or face covering and disposable gloves when preparing and serving meals.

Face Coverings and Personal Protective Equipment

- Adult PPE is in stock
- Adult face coverings (cloth and disposable)
  - Gloves
  - Face Shields
  - Gowns
- Child face coverings are stocked (cloth and disposable)

**Cleaning and Disinfection Strategy for COVID-19 Virus**
- Every sink is supplied with soap and towels
- Site is supplied with cleaning and disinfecting products for use during the day
- Custodians will clean and disinfect interior spaces and high touch surfaces
  - Employees tasked with cleaning and disinfection will be provided with the appropriate training and personal protective equipment.
  - Electrostatic disinfectant systems are used daily
- Air circulation is increased by:
  - All HVAC systems are set to operate on the mode which delivers the highest percentage of fresh air as allowable based on outside air conditions
  - Air filters will be changed prior to the start of the school year and in recommended intervals in accordance with the manufacturer’s recommendation.
  - Open outdoor air dampers to 100% as indoor and outdoor conditions safely permit, as allowable based on the system.
  - Keeping windows and doors open to the extent that other occupant health considerations are not negatively impacted
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.
Appendix D: COVID-19 Training Roster

Date: [enter date]

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

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<th>Employee Name</th>
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Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

If the local department of health has identified the facility as an outbreak or there are 10 or more COVID-19 cases in an exposed workplace within a 14-day period, the County Office will enact enhanced procedures. These policies will apply until there are no new COVID-19 cases detected in a 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 have access to testing immediately and on or after day 5. 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.
  - COVID-19 testing will be available 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 24 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 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.