COVID-19 Prevention Program (CPP) for Notre Dame Academy

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

Date: January 29, 2021

Authority and Responsibility

Christine Linxwiler, Director of Communication, 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:

- 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:

Employees have the opportunity to identify any COVID-19 hazards anonymously through our COVID Concern page: COVID Concern Page, and/or an email can be sent to our COVID Response Team at covid19@ndasd.org.

Each month an employee is assigned to the COVID-19 Response team to evaluate unsafe or unhealthy work conditions, practices or procedures that are documented on the Appendix B: COVID-19 Inspections form

Employee screening

Staff and Teachers must self-screen for signs for symptoms or illness PRIOR to coming to school and complete the following assessment form on FACTS and enter their temperature.

ALL FIELDS ARE REQUIRED

Date
Staff Member
Staff Member’s Temperature
Have you had a fever above 100.0 in the last 24 hours? ☐ Yes ☐ No
Are you exhibiting any of these symptoms?
- Yes ☑️ No ☑️

Fever or chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, congestion or runny nose, nausea or vomiting, diarrhea.

Is anyone in your household experiencing any of these symptoms?
- Yes ☑️ No ☑️

If so, please use caution and monitor your health. If you begin to feel ill yourself, do not come to school.

Have you been in close contact in the last 14 days with someone diagnosed with COVID-19?
- Yes ☑️ No ☑️

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:

Every Wednesday, member of the COVID-19 Team will review NDA Exposure controls. If any of the conditions, practices or procedures do not meet the guidance, the Facilities Manager will be notified and a time to correct will be set. A daily status report will be sent to the COVID-19 team with the status update until the hazard has been corrected.

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:
- Teachers’ work areas are placed 6 feet from student desks.
- Visitors are not allowed in classrooms while school is in session.
- All volunteers enter the school through the outside gates and only assist outside.
- 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.
- Indoor gathering spaces are closed (Teacher’s Kitchen and Workroom - except for use of copier. Sign-ups will be required for use of the copier. Only one teacher/staff at a time)
- General Staff meetings are held via zoom
- Small groups or one on one meeting are held outside while following social distance protocol (6ft between staff and wearing masks)
- Staff are able to be outside for breaks and for lunch
- Prep rooms between classroom are available for staff to work independently
- Designated entry/exits are used by Staff
- Staff follows assigned direction flow while moving through campus
- 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.

- 3-Ply surgical masks are distributed each week, and are available upon demand.
- If employees encounter others who are not wearing face coverings, they are asked to
submit the information anonymously to our COVID Concern page: COVID Concern Page, and/or an email can be sent to covid19@ndasd.org.

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.
- **While in the classroom, teachers who are communicating or assisting young children, or those with special needs, may wear a face shield with a gator instead of a cloth face covering as long as the wearer maintains physical distance from others, to the extent practicable. Staff must resume wearing a face covering as soon as practical.**

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:

- All student desks have plexiglass partitions
- Office areas have plexiglass partitions
- Outdoor classrooms
- Air filters in each room

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

- **Building filters and vents are on scheduled cleaning rotation with our mechanical maintenance provider, Pacific Rim**
- Portable high-efficiency medical grade air cleaners are installed in each classroom.
- As is feasible, all windows and doors remain open.
- To minimize airflow across occupants in the classroom, air conditioner, heater and fans use is avoided.
- All classroom filters upgraded to at least a MERV 11 filter, the highest level that remains compatible with the existing ventilation system.

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

- The school will use, and provide for use, soap and water or detergent for cleaning, and disinfection products after an in-school COVID-19 case has been identified.

- **Our Facility Manager has created a cleaning schedules and provides supervision for the onsite janitor (same person each day). The schedule includes the cleaning of the following:**
  - Staff and student restrooms
  - High-touch areas outside (handrails, water filling stations, door knobs, etc)
  - Lunch tables after each recess and lunch rotation
• Teachers clean frequently-touched surfaces in their classrooms. Frequently touched surfaces in
the school include, but are not limited to:
  o Sink handles.
  o Shared tables, desks, or chairs
  o Door handles.
  o Shared technology and supplies.
• At the end of each school day, each space used by either teachers, students or Staff, will be
sanitized by a professional cleaning company (CityWide)
  • CityWide Janitorial Service is trained in the safe use of disinfectants.
  • Custodial staff are provided with PPE specified as appropriate for the products they
  use.
  • All disinfectants are kept out of the reach of children and stored securely.
  • All products used to sanitize are on the Environmental Protection Agency (EPA) “List
N: Disinfectants for use against SARS-COV-2” (List N) labeled to be effective against
emerging viral pathogens. Cleaning solution used at NDA each day by the cleaning
company is Peroxide RTU cleaner.
  • Each week classrooms will receive an Electrostatic Disinfectant Treatment.
    o The sprayer emits positively charged particles that “wrap around” surfaces in
the classrooms, which are negatively charged. Ultimately, it reaches the corners,
crevices, backsides, and other hard-to-reach places often missed during a
general cleaning.

Should we have a COVID-19 case in our workplace, we will implement the following procedures:
1) Notify Facilities Manager, Jeff Nolen
2) Notify our janitorial service, CityWide
  • Bathrooms: Cohort designated bathroom will be closed immediately. CityWide Porter
will begin immediate disinfection/sanitation. The Clorox 360 process will be
scheduled for immediate service. The bathroom will remain closed for 24 hours.
Students who normally use that bathroom will be redirected.
  • Classroom or office space: As soon as the students and teachers have left the
classroom, it will be closed. CityWide will provide the Clorox 360 service and the
room will remain closed for 24 hours.

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

• Providing each teacher with cleaning supplies to clean any shared items.

• Additionally, at the end of each school day, each space used by either teachers, students or
Staff, will be sanitized by a professional cleaning company (CityWide)
Hand sanitizing
In order to implement effective hand sanitizing procedures, we:
• Staff will wash/sanitize their hands frequently throughout the day, including when entering the classroom in the morning, before and after recess and lunchtime, after coughing or sneezing; after outside recreation, art, and anytime they use the restroom.
• Staff will wash their hands with soap for 20 second, rubbing thoroughly after application.
• Staff will use fragrance-free hand sanitizer when handwashing is not practicable. Sanitizer will be rubbed into hands until completely dry. Handwashing with soap and water will always be the first choice.
• Kindergarten through 2nd grade classrooms have sinks for handwashing as well as hand sanitizer dispensers.
• All other classrooms have hand sanitizer dispensers installed by entrances.
• Additional hand-sanitizer dispensers are located in the lunch areas, on the playgrounds, and the PE area.
• Portable soap and water hand washing stations are available on the playground.

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.

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:
• Required to be quarantine for 10 days and will be encouraged to be tested at one of the free county sites, locations will be provided – or they can make and an appointment to see their medical provider.
• San Diego County Testing Sites
• Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws will be shared via email.

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, our COVID-19 Response team via email at covid19@ndasd.org
• Employees can report symptoms and hazards without fear of reprisal by reporting anonymously to our COVID Concern page: COVID Concern Page.
• Employees with documented medical or other conditions that put them at increased risk if severe COVID-19 illness have the opportunity to work remotely when possible. This information was communicated during staff meetings.
• Employees are asked to be tested at least once every two months. If they would like to be tested voluntarily, testing site information is shared by the COVID-19 response team. San Diego County Testing Sites
• In the event of a workplace exposure or outbreak, employees will be notified of the positive
COVID case via email, and testing will be offered to the employees at a county testing site during work hours. A link to County Sites will be emailed. Testing results will be sent to the COVID-19 Response Team at COVID19@ndsd.org, and held in confidence.

- 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 will be communicated via email as needed.

Training and Instruction

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
  - COVID-19 is an infectious disease that can be spread through the air.
  - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
  - An infectious person may have no symptoms.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- Educational materials and tools for implementing the protocols in their classrooms will be provided, including the following:
  - Handwashing - Clean Hands Save Lives
  - Coronavirus disease 2019 (COVID-19) How To Protect Yourself
  - Coughing and Sneezing | Etiquette & Practice | Hygiene | Healthy Water
- Videos: (no audio)
  - COVID-19 Stop the Spread of Germs
  - Know Your Risk of Getting COVID-19
  - Times to Wear a Face Covering
  - How to Wear a Face Covering
- Lesson Plans:
  - Face Coverings KP-5th
  - Face Coverings-6th-8th
  - Handwashing-KP-5th
  - Handwashing-6th-8th
- Posters in all the rooms will be visual reminders of our protocol.
- Flu shot campaign will be initiated via email as soon as shots are available
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 with communication from our Controller.
- Providing employees at the time of exclusion with information on available benefits.

Reporting, Recordkeeping, and Access

It is our policy to:

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

Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
  - At least 24 hours have passed since a fever of 100 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.
Sr. Marie Pascale, Principal/President, January 29, 2021

[Type Title of owner or top management representative formally approving the program and have them sign and date]
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:**

**Date:**

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

<table>
<thead>
<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>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
# 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:** [enter date]

**Name of person conducting the inspection:** [enter names]

**Work location evaluated:** [enter information]

<table>
<thead>
<tr>
<th>Exposure Controls</th>
<th>Status</th>
<th>Person Assigned to Correct</th>
<th>Date Corrected</th>
</tr>
</thead>
<tbody>
<tr>
<td>Engineering</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Barriers/partitions</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ventilation (amount of fresh air and filtration maximized)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Additional room air filtration</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>[add any additional controls your workplace is using]</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>[add any additional controls your workplace is using]</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Administrative</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Physical distancing</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Surface cleaning and disinfection (frequently enough and adequate supplies)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hand washing facilities (adequate numbers and supplies)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Disinfecting and hand sanitizing solutions being used according to manufacturer instructions</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>[add any additional controls your workplace is using]</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>[add any additional controls your workplace is using]</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PPE (not shared, available and being worn)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Face coverings (cleaned sufficiently often)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gloves</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Face shields/goggles</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Respiratory protection</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>[add any additional controls your workplace is using]</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Appendix C: Investigating COVID-19 Cases

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

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

Date: [enter date]

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

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

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

*Should an employer be made aware of a non-employee infection source COVID-19 status.*
Appendix D: COVID-19 Training Roster

Date: [enter date]

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

<table>
<thead>
<tr>
<th>Employee Name</th>
<th>Signature</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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.