

COVID-19 Prevention Program (CPP)

Kenwood School District

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

Date: February 5, 2021

Authority and Responsibility

Mr. Bob Bales, Superintendent has overall authority and responsibility for implementing the provisions of this CPP in our workplace.

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:

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

Employee Screening

We screen our employees by:

All employees reporting to work will self screen for COVID-19 symptoms and risk factors. Body temperature thermometers are available at the school site.

Upon arrival to work and prior to entering any other areas of the campus or worksite, employees should report to the “daily health screener form for that school site”. In the form, every employee will:

self-assess their symptoms and risk factors; and

use a contactless thermometer to take their temperature; and

report that they have done so via digital google form; and

wash their hands, use hand sanitizer, or clean with an alcohol wipe prior to and after touching the provided equipment (i.e. thermometer, pen, iPad, etc.).

If screening onsite is necessary, face coverings are used during screening by both screeners and employees and, if temperatures are measured, non-contact thermometers are used

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

Correction of COVID-19 Hazards

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

Employees have the right to file a confidential safety and health complaint and request an inspection of your workplace if you believe there is a serious hazard or if you think your employer is not following COVID-19 safety protocols, guidelines and regulations. An anonymous reporting site has been created for staff to use.

The Kenwood School District takes all concerns and complaints seriously. The District values the concerns of our parents, staff, students and community. Complaints are respected and honored; there are no negative consequences for filing a complaint. No reprisals or retaliation shall be invoked against any student, parent or employee for processing, in good faith, a complaint, either on an informal or formal basis, or for participating in any way in these complaint procedures.

Unsafe or unhealthy work conditions, practices or procedures will be documented via the COVID-19 Complaint Form, and corrected in a timely manner based on the severity of the hazards, as follows:

The severity of the hazard will be assessed and correction time frames assigned, accordingly.

Individuals are identified as being responsible for timely correction.

Follow-up measures are taken to ensure timely correction.

Controls of COVID-19 Hazards

Physical Distancing

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

Physical Distancing

Where possible, we ensure at least six feet of physical distancing at all times in our workplace. Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved. In these situations the encounter will be kept brief and masks must be worn.

Layouts and social distancing include positioning staff work areas so that they are a safe distance away from high traffic areas. This may include the need for moving desks, rerouting traffic, or installation of plexiglass or other types of dividers.

For all positions that perform one-on-one legally required student testing (e.g. school psychologists, speech, nurses, educational specialist teachers, and any other KSD staff), at least one "room" (preferably an outside location) per site will be set up for testing. The room will be equipped with an adequate supply of PPE, including plexiglass as necessary, masks, gloves, and cleaning supplies. Seating will be spaced at least 6 feet apart to ensure social distancing can be maintained when testing.

The number of persons allowed in the restrooms at one time will be established based on social distancing requirements based on the size of the restroom including available stalls. This may involve staff monitoring or limiting access to 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, 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.

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. Face coverings are required for all persons (staff, students, parents, or community members) who are at the school site. The District has purchased an ample supply of face masks. Staff will also be provided with the option of a District purchased face shield. Shields should be used by all who are engaged in instructional activities, tasks where the ability to see one's facial expression or lip movements is necessary or when there is an issue of personal safety (E.g. DHH students/teachers or anyone who is incapacitated and is unable to remove their face covering without assistance). Employee training will be provided the proper use and etiquette of all face coverings.

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

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

case basis.

- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

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:

Engineering controls

We will install cleanable solid partitions that reduce the risk of aerosol transmission between fixed work locations where it is not possible to physically distance. For example, plexiglass barriers will be provided for high-traffic school site main office areas. Each classroom will also have a mobile plexiglass barrier. We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems unless there is poor outside air quality (an AQI of 100 or higher for any pollutant) or some other hazard to employees such as excessive heat or cold. Ventilation systems have been checked to be in working order and will be monitored for proper operation. KSD will continue to replace all Heating, Ventilation & Air Conditioning (HVAC) filters on the regular replacement cycle. Replacement cycles will be adjusted accordingly based on guidance or need. In addition to HVAC, best practices for classroom and office ventilation are to have windows and doors open to allow air flow to provide as much fresh air as possible. All classrooms have been equipped with low noise HEPA air filters with a large enough capacity and flow rate for the square footage of the room.

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

Staff are encouraged to open doors and windows when weather and air quality permit this. When staff need to meet or talk for more than 15 minutes, they are encouraged to meet outdoors.

Cleaning and disinfecting

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

Custodial staff at Kenwood School District have been thoroughly trained in the proper cleaning and disinfecting of classrooms, offices, workspaces, indoor/outdoor common areas, and frequently touched surfaces within the school. Cleaning supplies will continue to be stored away from children.

Schedules will be set up to provide for cleaning and disinfecting during the day and to provide increased cleaning and disinfecting and to disinfect due to COVID. Schedules will be shared with all stakeholders. Below is a sample schedule (at minimum), as each site has established a schedule to meet their needs.

Classrooms: Daily disinfecting by custodians

Offices: Daily disinfecting by custodians

Indoor/Outdoor Common Areas: Daily disinfecting by custodians

Restrooms: Disinfecting every 2 hours

A complete disinfecting protocol will occur on the site for which a positive COVID-19 case was reported. This will include all the exposed and potentially exposed office/work areas on the site, as well as, the restrooms and shared spaces.

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

Any students or staff exhibiting symptoms should immediately be required to wear a face covering and be required to wait in an isolation area (care room) until they can be transported home or to a healthcare facility. · Sick staff members or students should not return until they have met CDC's criteria to discontinue home isolation · Immediately separate staff and children with COVID-19 symptoms (such as fever, cough, or shortness of breath) at school. Individuals who are sick should go home or to a healthcare facility depending on how severe their symptoms are, and follow CDC guidance for caring for oneself and others who are sick.

- Work with school administrator, nurses, and other healthcare providers to identify an isolation room or area (care room) to separate anyone who has COVID-19 symptoms, or who tests positive but does not have symptoms.
- Safely transport anyone who is sick to their home or to a healthcare facility. If you are calling an ambulance or bringing someone to the hospital, try to call first to alert them that the person may have COVID-19.
- Close off areas used by a sick person and do not use these areas until after cleaning and disinfecting · Wait at least 24 hours before cleaning and disinfecting. If 24 hours is not feasible, wait as long as possible. Ensure safe and correct use and storage of cleaning and disinfection products, including storing products securely away from children.
- In accordance with state and local laws and regulations, school administrator should notify local health officials, staff, and families immediately of any case of COVID-19 while maintaining confidentiality as required by state and federal laws including the Americans with Disabilities Act (ADA) and HIPAA. See below for Sonoma County protocol. · Inform those who have had close contact with a person diagnosed with COVID-19 to stay home and self monitor for symptoms, and follow CDC guidance if symptoms develop.

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:

KSD will 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.

Discourage sharing of items that are difficult to clean or disinfect

- Keep each child's belongings separated from others' and in individually labeled containers, cubbies, or areas · Ensure adequate supplies to minimize sharing of high touch materials to the extent possible (e.g., assigning each student their own art supplies, equipment) or limit use of supplies and equipment by one group of children at a time and lean

and disinfect between use

- Avoid sharing electronic devices, toys, books, and other games or learning aids
- Shared objects (gym or physical education equipment, art supplies, toys, games) will be limited and regularly disinfected
- PE/recess equipment will be used with one cohort/group at a time and disinfected daily · Students will be provided with a container/pouch to store all necessary materials (Pencils, pens, crayons, glue stick, reference /study materials, etc)
- Students will be assigned their own electronic device if used in the classroom and one will be provided for them in the event of a return to Distance Learning

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:

Evaluate hand washing facilities to ensure they are clean and contain the proper supplies in sufficient quantities. · Determine the need for additional facilities.

- Encourage and allow time for employee hand washing.
- Provide employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Encouraging employees to wash their hands for at least 20 seconds each time

Notes:

- Students will be required to wash their hands with soap and water for at least 20 seconds, or use hand sanitizer with at least 60% alcohol at the following times: upon arrival at school (use hand sanitizer if there is no sink in the classroom), after being outside for physical activity; before and after break and lunch; prior to leaving school for home and; after sneezing, coughing, or nose blowing.

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- Hand washing/hygiene signs will be placed in all school bathrooms, to promote proper hand washing by students and staff
- Workers or other persons handling or serving food must use gloves in addition to face coverings. Employers should consider where disposable glove use may be helpful to supplement frequent handwashing or use of hand sanitizer; examples are for workers who are screening others for symptoms or handling commonly touched items.

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

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

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained. [reference section 3205(c)(E) for details on required respirator and eye protection use.]

We provide and ensure use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

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:

This will be accomplished by using the COVID-19 Potential Response Scenarios in a School Setting. KSD, through the designated COVID-19 Coordinator, will work with the district nurse and in coordination with the County Health Department through their existing protocols for contact tracing, as needed, and identify whether quarantine of impacted students and staff is necessary. Contacts will be identified based on the duration of the contact, the proximity of the contact, and the number of people.

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

Contacted by the district Nurse/Covid Coordinator with guidance and next steps

Offered information about COVID-19 testing

Will be provided information about benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below.

District procedures will be updated and shared with staff as they are revised.

System for Communicating

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

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

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

Testing is available at various places throughout Sonoma County. A complete list can be found at the following website: <https://socoemergency.org/emergency/novel-coronavirus/testing-and-tracing/>

In addition, all school employees have access to free testing through the Curative van that is located at the Rincon Valley School District office on-site or nearby approximately on a weekly basis.

- In the event we are required to provide testing because of a workplace exposure or outbreak, we will

communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test.

- That employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Where testing is not required, how employees can access COVID-19 testing:

Employees can access testing through district supported Curative testing or through county/public options Employees will be notified if testing becomes required.

- In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test.

If required to provide testing because of an employee exposure, testing will be accomplished at no cost to the employee during working hours, including when the testing is in response to CCR Title 8 section 3205.1, Multiple COVID-19 Infections and COVID-19 Outbreaks, as well as section 3205.2, Major COVID-19 Outbreaks. The District will provide COVID-19 testing through the Curative van testing site at no cost to employees during their working hours to all employees who had potential close contact COVID-19 exposure at the worksite.

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

Ongoing communication and emails will be sent to employees related to COVID-19 updates and reminders.

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.

Employees will receive training specific to their job description.

· training will focus on:

Cleaning and disinfecting

Proper use of PPE

Positive case procedures

social distancing, handwashing and safety on 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

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

Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.

Excluding employees with COVID-19 exposure from the workplace for 10-14 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 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.

Allowing staff to work remotely when appropriate, during their quarantine.

- 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.

ALL staff and students who have tested positive for Covid-19, will be reported to the County Health Dept. Data on the number of cases will be maintained.

Upon approval, this document will be available to all employees and their agents upon request. Individuals who have tested positive for Covid will have their identity protected as required by confidentiality laws.

Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
 - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
 - COVID-19 symptoms have improved.
 - At least 10 days have passed since COVID-19 symptoms first appeared.
- COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test. • A negative COVID-19 test will not be required for an employee to return to work.
- If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.

Appendix A: Identification of COVID-19 Hazards

All persons, regardless of symptoms 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 Employees and Authorized Employee Representative that Participated:

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

Date:

Name of Person Conducting the Inspection:

Work Location Evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/Partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Administrative			
Physical distancing			

Surface cleaning and Disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Face shields/goggles			
Respiratory protection			

Appendix C: Investigating COVID-19 Cases

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

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

Date:

Name of Person Conducting the Investigation:

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

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):	
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Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:		
All employees who may	Date:	

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

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

Appendix D: COVID-19 Training Roster

Date:

Name of Person Conducting the Training:

Employee Name	Signature

Additional Consideration #1

Multiple COVID-19 Infections and 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 COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period. COVID-19 testing will be provided at no cost to employees during employees' working hours.
- COVID-19 testing consists of the following:
 - All employees in our exposed workplace will be immediately tested and then tested again one week later.

Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by, the local health department.

- After the first two COVID-19 tests, we will continue to provide COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
- We will provide additional testing when deemed necessary by Cal/OSHA.

Exclusion of COVID-19 cases

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

Investigation of workplace COVID-19 illness

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

COVID-19 investigation, review and hazard correction

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

The investigation and review will be documented and include:

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

Notifications to the local health department

- Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in our workplace, we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- We will provide to the local health department the total number of COVID-19 cases and for each COVID-19 case,

the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and North American Industry Classification System code of the workplace of the COVID-19 case, and any other information requested by the local health department. We will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace.

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**.