

*St. Vincent de Paul Elementary School*  
*Petaluma, California*



*COVID-19*  
*Prevention Program (CPP)*

*February 17, 2021*

## Model COVID-19 Prevention Program (CPP)

With some exceptions, all employers and places of employment are required to establish and implement an effective written COVID-19 Prevention Program (CPP) pursuant to an Emergency Temporary Standard in place for COVID-19 (California Code of Regulations (CCR), Title 8, section [3205\(c\)](#)). Cal/OSHA has developed this model program to assist employers with creating their own unique CPP tailored to their workplace.

Employers are not required to use this program. Employers may create their own program or use another CCP template. Employers can also create a written CCP by incorporating elements of this program into their existing Injury and Illness Prevention Program (IIPP), if desired. Cal/OSHA encourages employers to engage with employees in the design, implementation and evolution of their COVID-19 Prevention Program.

Using this model alone does not ensure compliance with the emergency temporary standard. To use this model program effectively, the person(s) responsible for implementing the CPP should carefully review:

- All of the elements that may be required in the following CCR, Title 8 sections:
  - o [3205, COVID-19 Prevention](#)
  - o [3205.1, Multiple COVID-19 Infection and COVID-19 Outbreaks](#)
  - o [3205.2, Major COVID-19 Outbreaks](#)
  - o [3205.3, Prevention in Employer-Provided Housing](#)
  - o [3205.4, COVID-19 Prevention in Employer-Provided Transportation to and from Work](#)
  - o The four [Additional Considerations](#) provided at the end of this program to see if they are applicable to your workplace.

The additional guidance materials available at [www.dir.ca.gov/dosh/coronavirus/](http://www.dir.ca.gov/dosh/coronavirus/)



November 2020

**COVID-19 Prevention Program (CPP) for  
St. Vincent de Paul Elementary School  
Union Street and Howard Street  
Petaluma, CA 94952  
(707) 762-6426**

The purpose of St. Vincent De Paul Elementary School's COVID-19 CPP is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace. It will provide employees a healthy and safe workplace as required under the California Occupational Safety and Health Act.

**Date: February 17, 2021**

## **Authority and Responsibility**

**Reverend William P. Donahue** has overall authority and responsibility for implementing the provisions of this CPP in the school's 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**

St. Vincent de Paul Elementary School will implement the following in the 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 the 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. All employees are required to report any potential COVID-19 hazards immediately. Hazards are to be reported directly to Joanne Murphy and the school's administration upon discovery.

## **Employee screening**

St. Vincent de Paul Elementary School screens all employees daily.

All employees must complete a self-screening from home, prior to coming to work, according to the CDPH guidelines. They will self-assess utilizing the form provided by the employer and record responses daily. The Employee Health Screening Record will be submitted at the end of each month to administration.

### **St. Vincent de Paul Elementary School Employee Health Screening**

1. The employee is to self-assess the following questions prior to arrival on campus each work day:
  - a. Are you or anyone in your household experiencing any new or worsening symptoms of COVID-10: a fever, feeling hot/feverish, or experiencing chills recently, having difficulty breathing or shortness of breath, have a cough or sore throat, have any flu-like symptoms such as gastrointestinal upset, headache, fatigue or recently lost sense of smell or taste?
  - b. Have you taken medication in the past 12 hours for any of the above symptoms?

- c. Have you or anyone in your household been in contact with anyone with a suspected or confirmed case of COVID-19 or traveled to an area with a significant increase in COVID-19 cases in the past 14 days?
  - i. If they feel at all sick or have any of the above symptoms, they will stay home and inform Joanne Murphy and the school's administration.
  - ii. They will stay home if they have been exposed to someone with COVID-19 and inform Joanne Murphy and the school's administration.
  - iii. If the employee receives a COVID-19 Positive test, he/she will immediately inform the school's administration and not return to work until cleared by a health care provider.
2. If the answer to all questions is "No," the employee is to have his/her temperature taken upon arrival each work day in the school office.
3. The employee is to record the temperature in the box corresponding to the date on the calendar and initial.
4. If the employee's temperature is below 100.0 F, the employee is "cleared" for being on campus.
5. If the employee answers "Yes" to any question or has a temperature above 100.0 F, the employee will immediately isolate and notify the administration.

If any employee responds "yes" to a screening question, they are to notify Joanne Murphy and the administration immediately, and not report to work. The employee will not return to work until satisfying all criteria in The-Return-To-Work Criteria.

If employees respond "no" to all screening questions, upon arrival at the workplace, all employees will participate in a no-contact temperature screening each school day with both employee and screener wearing masks. Employees will maintain personal records of daily temperatures and official documentation will be recorded and managed by Joanne Murphy.

Routine/asymptomatic onsite, weekly testing for all employees (while in both the purple tier and red tier as recommended by the California Department of Public Health). The school contracts with PMH Laboratory, Inc. and Curative Lab Inc. and will conduct routine testing onsite at no cost to employees. The school has established cohorts so that testing will occur on a rotating basis as recommended. The testing schedule will be reviewed and adjusted based on the recommendations of the Sonoma County Department of Public Health.

## **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:

St. Vincent de Paul Elementary School's administration 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:
  - Leave policies and practices and whether individuals are discouraged from remaining home when sick
  - 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
  - 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

## **Control of COVID-19 Hazards**

### **Physical Distancing**

Where possible, St. Vincent de Paul Elementary School ensures at least six feet of physical distancing at all times in our workplace by:

- There will be staggered arrival and departure times. Kindergarten-grade six will have scheduled arrival times by last name (A-K 7:45-8:05 am and L-Z 8:05-8:25 am).
- Kindergarten will dismiss at 11:45 am. Grades 1-2 will dismiss at 12:00 pm. Grades 3-6 will dismiss at 12:30 pm. Students will stand on physical distance marks on the playground during dismissal and lingering on campus will not be permitted at any time.
- Recess/breaks will be staggered and outside to permit eating, if necessary. There are 160 painted dots on the pavement/playground that are a minimum of 6 feet apart. Students will remain on their respective dot when on the pavement/playground to maintain physical distancing at all times. Students are required to bring a fully disposable bag for snack/lunch. Lunch deliveries are not permitted, including parent lunch drop-off during the school day. Recess activities will be limited to movement activities that do not include playground equipment.
- Teachers will instruct the students on procedures for movement in the classrooms, hallways, on the playground, and when utilizing restrooms. Grades 2 and 3 will enter and exit through the main entrance of the main school building. Grades 1 and 6 and grades 4 and 5 will utilize the side doors nearest their respective classrooms for entry and exit. Students in Grades 7-8 will use the 7th grade outer stairs to enter and exit the Academy Building through the top front door, entering via the staircase on the right and exiting on the left. The kindergarten students will use the back first floor door to enter and exit the building. These routes and procedures will be reviewed regularly with the students.

- Classroom entry and exit routes will be identified, marked, communicated, and reinforced by the teacher.
- The hallways and staircases are labeled for one-way routes and physical distancing.
- Student lockers will not be utilized.
- Faculty and staff meetings, parent-teacher conferences, and professional development will be provided virtually to safely ensure the continued growth of the faculty and staff and communication with parents.
- The school office has been outfitted with a Dutch door to maintain physical distancing.
- Faculty and staff have been instructed not to visit other spaces and classrooms and to disinfect shared spaces after each use.
- The teacher break room/staff lounge has been closed for gatherings with limited use of appliances.
- Parents, volunteers and visitors are not permitted on campus.

### **Face Coverings**

St. Vincent de Paul Elementary School requires employees to use an appropriate face covering of their own choosing, or provides face coverings to employees upon request. The school requires all individuals to wear face coverings on school worksites and facilities. This includes all students on campus. The school requires new, clean, undamaged (2 ply) face coverings. Masks are to be well-fitted and 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. Students will be required to provide two extra face masks (labeled in a sealed bag) to be kept at school in the event a new mask is needed. Parents will provide a clean ziplock bag labeled with their child's name for face mask storage during snack time. Additional masks will be available should a mask be needed during the school day. The proper wearing, removal, and cleaning of masks has been explained and reviewed with employees and students. Students and staff will be frequently reminded not to touch the face covering and to wash their hands frequently. Students who do not arrive at school wearing a mask will be provided with a disposable mask for access to campus. Students who refuse to wear a mask may not remain on campus. Face shields have also been provided for employees. Face shields do not take the place of required masks. Face shields have been labeled with employee names. Employees have been instructed to clean and disinfect the face shields per guidance. The sharing of PPE is not permitted. A face covering or face shield will be removed for snacks or meals, or when it needs to be replaced. When a cloth face covering is removed, it will be placed in a clean, safe container marked with their name and date until it needs to be put on again.

Staff and students have received specific information on approved types of face coverings:

- Approved: double layer, minimum of 2 ply, cloth masks and disposable 2-3 ply medical face masks only that fit snugly and completely cover the nose and mouth
- Not approved: masks with valves, bandanas, gaiters or single layer, loose fitting cloth masks

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. However, COVID-19 testing is not used as an alternative to face coverings when face coverings are otherwise required by this section. Should your employees encounter non employees that are not wearing face coverings, they will report the information to the administration and the individual will be given a face mask and, if refused, will be instructed to leave campus.

### **Engineering Controls**

St. Vincent de Paul Elementary School maximizes, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by:

- Classroom windows will remain fully open at all times except when the United States Environmental Protection Agency (“EPA”) Air Quality Index is greater than 100 for any pollutant or if opening windows would cause a hazard to an employee (for example, from excessive heat or cold). Classroom doors will remain fully open at all times.
- The school will install portable air purifiers in the Main Building classrooms. Regular monitoring of Air Purifying Filters in the Academy Building will occur. The facilities director will monitor all ventilation systems.
- Overhead fans will not be used.
- In the event of poor air quality, the school will transition to a distance learning model until conditions are safe per EPA index.

St. Vincent de Paul Elementary School implements the following measures for situations where the school cannot maintain at least six feet between individuals:

- Where a distance of six feet is not possible to maintain clearance for entry and exit, plexiglass partitions will be used to mitigate the risk of infection.

### **Cleaning and Disinfecting**

St. Vincent de Paul Elementary School implements the following cleaning and disinfection measures for frequently touched surfaces:

- The school uses EPA approved cleaning products and has trained all staff in COVID-19 cleaning procedures and protocol for sanitizing and disinfection. The school’s janitorial service, Northbay Cleaning Company, has been trained in cleaning and disinfection to mitigate the spread of COVID-19. The contracted janitorial service will perform a comprehensive cleaning and disinfection daily of the school premises, including, but not limited to, hallways, classrooms, and restrooms. The contracted janitorial service will utilize proper equipment, EPA approved disinfectant, and PPE. Employees are trained on the hazards of the disinfectants, to use only in well ventilated areas, to use any PPE that is required, and to never mix chemicals. Employees will be notified of the janitorial cleaning scope of work and schedule.

In addition, the faculty and staff will disinfect school frequently touched surfaces throughout the school day. Workspaces in classrooms and offices will be disinfected at the end of each use and each day. Appliances such as refrigerators, microwaves, and coffee machines will be disinfected at the end of each use. Electronic equipment such as copy machines, computer monitors, TV's, telephones and keyboards will be disinfected at the end of each use and the end of each day. Frequently touched surfaces like handles, light switches, sinks, bathroom surfaces, equipment, controls, and handrails will be disinfected regularly throughout the day and at the end of the day. There will be limited access to workspaces to mitigate health risks. Faculty and staff have been instructed not to visit other spaces and classrooms and to disinfect shared spaces after each use. All employee work areas are equipped with approved cleaning supplies and employees are expected to keep their own work areas cleaned and disinfected. Shared spaces and equipment such as restrooms, refrigerators, and copy machines also have cleaning supplies and signage with instructions for disinfecting.

Should a COVID-19 case in the workplace occur, the school will implement the following procedures:

- The school's janitorial service, Northbay Cleaning Company, has been trained in cleaning and disinfection to mitigate the spread of COVID-19. The contracted janitorial service will perform a comprehensive cleaning and disinfection of the school premises, materials, and equipment used by a COVID-19 case individual, including, but not limited to, hallways, classrooms, and restrooms. The contracted janitorial service will utilize proper equipment, EPA approved disinfectant, and PPE. Employees are trained on the hazards of the disinfectants, to use only in well ventilated areas, to use any PPE that is required, and to never mix chemicals.

### **Shared Tools, Equipment and Personal Protective Equipment (PPE)**

The school will provide PPE for all staff. Masks, face shields and gloves will be provided by the school and available to employees. The sharing of PPE is not permitted. All employees have been issued individual technology devices to prevent the need for shared devices. 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 employees using approved cleaning products. Employees will be trained in COVID-19 cleaning, disinfection, and sanitizing procedures for all shared tools and equipment. While sharing will be kept to a minimum, all shared equipment will be disinfected in between each use and at the end of each day.

### **Hand Sanitizing**

In order to implement effective hand sanitizing procedures, St. Vincent de Paul Elementary School:

- All persons on campus will be encouraged to wash hands frequently with soap and water for at least 20 seconds and utilize hand sanitizing stations. Students and employees will be provided with opportunities to wash hands through the day to support "Hand Hygiene." Hand washing time has been scheduled throughout the school day, including before and after eating times.
- Hand washing protocol signage is posted throughout the school. Proper handwashing techniques will be taught and reinforced. Families will be provided with guidance to teach and reinforce hand hygiene. Hand washing stations throughout the school will be monitored and refilled by office personnel.
- The school has been outfitted with hand sanitizer wall stations at the entrance to every classroom and all other rooms, the front office, the Library, and all restrooms.
- The hand sanitizing stations will be monitored and stocked by school office personnel. Each classroom will have hand sanitizer available to support "Hand Hygiene." All hand sanitizing

pumps and stations throughout the school have at least 62% ethyl alcohol. The school does not provide hand sanitizers with methyl alcohol.

- Drinking fountains will not be available. Touchless water filling stations have replaced drinking fountains in the school buildings. The drinking fountain on the playground has been turned off. Students are to bring a clean, refillable water bottle to school each day. Water bottles should be cleaned and sanitized at home daily. No sharing of water bottles is allowed.

### **Personal Protective Equipment (PPE) Used to Control Employees' Exposure to COVID-19**

St. Vincent de Paul Elementary School evaluates the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, and provides such PPE as needed. When it comes to respiratory protection, the school evaluates the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained. The school provides and ensures 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. The school will provide PPE to all employees, including 2-ply face coverings, face shields and gloves upon request. The school's screener/contact tracer has been fit-tested with an N95 mask. Employees are trained when and why PPE is necessary, how to properly put on and take off PPE, and how to clean, maintain, and store reusable PPE.

### **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:

#### *SVES Protocols on the Onset of Symptoms Chart*

When a student is showing symptoms of an illness, they will be immediately placed in the school's isolation room. The student will be comfortably isolated while continuing to wear a face mask. The school nurse's room is the designated Isolation Room. There is good ventilation in the isolation room. School personnel will escort the student/employee to the isolation room. Screening will take place in the isolation room. School personnel screening the ill student will wear full PPE (disposable gloves, 2 ply face mask, face shield) provided by the school. A record of assessment and temperature will be recorded in Illness School Form to document symptoms. The parent/guardian will be contacted immediately when a student reports any symptoms of COVID-19 and the student will be sent home with parents immediately. The isolation room will be thoroughly disinfected immediately after the student leaves in accordance with Health Department Guidelines. All areas where the student was prior to reporting symptoms will be cleared of students and staff and immediately thoroughly disinfected. SVES Protocol for onset of symptoms will be followed.

If a staff member shows symptoms of an illness, they will be immediately placed in the school's isolation room. Disinfection of all areas they were (desk, surfaces, areas) will occur in accordance with Health Department guidelines. Screening will take place in the isolation room. School personnel giving the staff member the screening will wear full PPE provided by the school. A record of assessment and temperature will be recorded in Illness School Form to document symptoms. The staff member will be immediately sent home. The isolation room will be thoroughly disinfected immediately after the staff member leaves. SVES Protocol for onset of symptoms will be followed. Staff members must consult with their physician if they experience symptoms of COVID-19 and the school requires a physician's note to return to work.

We require families to consult with the student's physician if a student experiences symptoms of COVID-19. The student may return to school with a physician's note 3 days after fever and symptoms have resolved. We strongly encourage COVID-19 testing immediately.

COVID-19 testing will be provided to employees and students on an ongoing basis. SVES will follow all reporting requirements and guidelines should there be a confirmed positive case of COVID-19 among students and/or employees

### **System for Communicating**

In the event that an individual at St. Vincent de Paul Elementary School has a confirmed case of COVID-19, we will contact the Sonoma County Health Department using the school hotline number: (707) 565-4667. In consultation with the Sonoma County Health Department, school officials will decide if closure of a stable group/classroom or the entire school is required. In consultation with public health, we will consider closing a class if one or more students or staff members are confirmed to have COVID-19. In consultation with public health, we will close our entire school if multiple cohorts or classes have confirmed cases of COVID-19 or 5% of all students/staff have confirmed cases. We will reopen in consultation with public health, typically after 14 days have passed and:

- All classrooms have been cleaned and disinfected
- public health has conducted an investigation
- the Sonoma County Health Department has been conducted

The school will communicate in writing with parents/guardians and staff to notify of any exposure or confirmed case(s) of COVID-19, ensuring the confidentiality of that individual as required by the ADA, HIPPA, and FERPA. All employees may confidentially report, without fear of discrimination or retaliation, any symptoms, potential hazards, relating to COVID-19 at the workplace. Employees should make these reports to the school's administration. All employees will be provided access to the school's Covid Prevention Plan and the CSP plan which has detailed information about all aspects of COVID prevention.

Accommodations employees with medical or other conditions that put them at increased risk of severe COVID-19 illness. The school's contract with PMH Laboratory and Curative Labs, Inc. will provide employees and students with Asymptomatic COVID-19 testing at no cost. In the event we are required to provide testing because of a workplace exposure or outbreak, the school's contract with PMH Laboratory and Curative Labs, Inc. will provide employees and students with COVID-19 testing at no cost.

### **Training and Instruction**

St. Vincent de Paul Elementary School will provide effective training and instruction that includes:

- COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
  - COVID-19 is an infectious disease that can be spread through the air.
  - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
  - An infectious person may have no symptoms.

- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
  - The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

The school will train employees on the policies of the Covid-10 Safety Plan. **Appendix D: COVID-19 Training Roster** will be used to document this training. The Training Roster will be maintained by the school's administration.

### **Exclusion of COVID-19 Cases**

Where St. Vincent de Paul Elementary School has a COVID-19 case in the workplace, the school will limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until the identified return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 10 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 providing employees at the time of exclusion with information on available benefits.

Information on available benefits will be provided at the time of exclusion per diocesan policy.

### **Reporting, Recordkeeping, and Access**

It is St. Vincent de Paul Elementary School's 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. We will report to Cal/OSHA as soon as possible, but within 8 hours after knowledge.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make the 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. We will keep a record of and track all COVID-19 cases. These records include the employee's: name, contact information, occupation, location where the employee worked, date of the last day at the workplace, date of positive COVID-19 test. All medical information will be kept confidential. The log of COVID-19 cases will be made available to employees, authorized employee representatives, or as otherwise required by law (with the names and contact 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.
- 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.

Employees that have approval from Cal/OSHA on the basis that removal of the employee would create undue risk to a community's health and safety. In these instances, effective control measures such as isolation or respiratory protection will be implemented to prevent infection of other employees at the workplace.

### **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.



## 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]

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
[add any additional controls your workplace is using]			
[add any additional controls your workplace is using]			
<b>Administrative</b>			
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			
[add any additional controls your workplace is using]			
[add any additional controls your workplace is using]			
<b>PPE</b> (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			

Face shields/goggles			
Respiratory protection			
<b>[add any additional controls your workplace is using]</b>			

**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 unreacted 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) Unreacted 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)]

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

<p style="text-align: center;"><b>Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):</b></p>	
--	--

<p><b>Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:</b></p>		
<p style="text-align: center;"><b>All employees who may have had COVID 19 exposure and their authorized representatives.</b></p>	<p style="text-align: center;"><b>Date:</b></p>	
	<p style="text-align: center;"><b>Names of employees that were notified:</b></p>	
<p style="text-align: center;"><b>Independent contractors and other employers present at the workplace during the high-risk exposure period.</b></p>	<p style="text-align: center;"><b>Date:</b></p>	
	<p style="text-align: center;"><b>Names of individuals that were notified:</b></p>	

<p><b>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</b></p>		<p><b>What could be done to reduce exposure to COVID-19?</b></p>	
<p><b>Was local health department notified?</b></p>		<p><b>Date:</b></p>	

\*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)]**

<b>Employee Name</b>	<b>Signature</b>

## **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 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.