Compass Charter Schools COVID-19 Prevention Program

An Addendum to the Injury and Illness Program

In accordance with TITLE 8, DIVISION 1, CHAPTER 4, Subchapter 7. General Industry Safety Orders Section 3205, COVID-19 Prevention, this CPP is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace.

August 1, 2021

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Authority and Responsibility

J.J. Lewis has the authority and the responsibility for implementing the provisions of this program for the Compass Charter Schools. District Administrators, Department Supervisors, and managers are responsible for implementing and maintaining the CPP in their work areas and for answering worker questions about the CPP.

Definitions

The following definitions apply:

"COVID-19" means coronavirus disease, an infectious disease caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).

"COVID-19 case" means a person who:

(1) Has a positive "COVID-19 test" as defined in this section;

(2) Is subject to COVID-19-related order to isolate issued by a local or state health official; or

(3) Has died due to COVID-19, in the determination of a local health department or per inclusion in the COVID-19 statistics of a county.

"COVID-19 exposure" means being within six feet of a COVID-19 case for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the "high-risk exposure period" defined by this section. This definition applies regardless of the use of face coverings.

"COVID-19 hazard" means exposure to potentially infectious material that may contain SARS-CoV-2, the virus that causes COVID-19. Potentially infectious materials include airborne droplets, small particle aerosols, and airborne droplet nuclei, which most commonly result from a person or persons exhaling, talking or vocalizing, coughing, sneezing, or procedures performed on persons which may aerosolized saliva or respiratory tract fluids, among other things. This also includes objects or surfaces that may be contaminated with SARS-CoV-2.

Employee Participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by wearing your mask often, practicing social distancing, and washing hands often.

Employees are to report any hazards to the <u>HRteam@compasscharters.org.</u>

Employee Screening

Our employees are required to self-screen at home, according to CDPH guidelines, before coming to work. If an employee exhibits any of these symptoms, they are to remain at home and contact their supervisor and the Department of Human Resources at <u>HRteam@compasscharters.org</u>.

Symptoms of Coronavirus (COVID-19)

Know the symptoms of COVID-19, which can include the following:



Symptoms can range from mild to severe illness, and appear 2–14 days after you are exposed to the virus that causes COVID-19.

If an employee feels ill during the workday, they are to immediately notify their supervisor and leave work, and it is highly recommended that they contact their physician.

Physical Distancing

Recent evidence indicates that in-person instruction can occur safely without minimum physical distancing requirements when other mitigation strategies (e.g., masking) are implemented. This is consistent with <u>CDC K-12 School Guidance</u>.

Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and where required by orders from the California Department of Public Health (CDPH) or local health department. We will:

- Comply with all public health orders regarding face coverings
- Provide face coverings to all employees as needed
- Ensure they are worn by employees over the nose and mouth when indoors and where required by orders from the CDPH or local health department.
- Ensure face shields are not used as a replacement for face coverings, although they may be worn together for additional protection.

Consistent and Correct Mask Use

When teachers, staff, and students who are not fully vaccinated consistently and correctly wear a mask, they protect others as well as themselves. Consistent and correct mask use by people who are not fully vaccinated is especially important indoors and in crowded settings, when physical distancing cannot be maintained.

- Indoors: Mask use is recommended for people who are not fully vaccinated including students, teachers, and staff. Children under 2 years of age should not wear a mask.
- Outdoors: In general, people do not need to wear masks when outdoors. However, particularly in areas of substantial to high transmission, CDC recommends that people who are not fully vaccinated wear a mask in crowded outdoor settings or during activities that involve sustained close contact with other people who are not fully vaccinated
- A person who cannot wear a mask, or cannot safely wear a mask, because of a disability as defined by the Americans with Disabilities Act (ADA) (42 U.S.C. 12101 et seq.). Discuss the possibility of reasonable accommodation with workers who are not fully vaccinated who are unable to wear or have difficulty wearing certain types of masks because of a disability.
- A person for whom wearing a mask would create a risk to workplace health, safety, or job duty as determined by the relevant workplace safety guidelines or federal regulations

- When masks are worn by teachers and school staff in the workplace, the masks should meet one of the following criteria:
 - <u>CDC mask recommendations</u>
 - <u>ASTM International Standard Specification for Barrier Face Coverings</u> <u>external icon</u>
 - NIOSH Workplace Performance and Workplace Performance Plus masks
- Schools should be supportive of people who are fully vaccinated but choose to continue to wear a mask, as a personal choice or because they have a medical condition that may weaken their immune system. School administrators will also need to ensure their selected mask use policy does not conflict with local, state, and territorial laws, policies, and regulations.

NOTE: CDPH has issued guidance for CCSs that identifies examples when wearing a face covering is likely not feasible.

• Employees exempted from wearing face coverings due to a medical condition, mental health condition, or disability shall wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits it.

• 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. COVID-19 testing cannot be used as an alternative to face coverings when face coverings are otherwise required.

• CCS will not prevent any employee from wearing a face-covering when required, unless it would create a safety hazard, such as interfering with the safe operation of equipment.

• CCS will implement the following measures to communicate to non-employees the face coverings requirements on their premises:

• Signage in each school and workspace at the entrance.

• Reinforced in all school reopening documents

Engineering Controls

We implement the following measures for situations where we cannot maintain at least six feet between individuals:

- Physical barrier installations (partitions) where feasible
- We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by:
 - Ensuring our HVAC equipment is serviced.
 - Cleaning and sterilization of all supply and return ducts throughout the building as necessary, using a disinfectant.
 - \circ $\;$ Advanced notification to employees of HVAC work.

Cleaning and Disinfecting

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

- Cleaning and disinfecting are performed four nights a week either by the Facilities Department or an outside cleaning company and include a routine cleaning of offices and common areas, and spot sterilization (bathroom fixtures, door handles, etc.)
- The team performs sterilization of all common areas and bathrooms, ensuring adequate time for the procedure to be accomplished.
- A deep cleaning and disinfection procedure is performed by the Church
- Additional deep cleaning is performed when circumstances dictate

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

- Deep cleaning is performed of potentially contaminated surfaces
- In the event that extensive disinfection is required that exceeds the capabilities of the Church, an outside contractor will be selected and deployed.

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 the employee. The Facilities Department provides approved disinfectant solutions and supplies for department and employee use.

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seat belt buckles, armrests, shifter, etc.) will be disinfected between users.

Hand Sanitizing

In order to implement effective hand sanitizing procedures, we:

- Encourage and allow time for employee handwashing.
- Encourage employees to wash their hands for at least 20 seconds each time, with warm water.
- Hand sanitizing stations are provided at the entrance at each location, and in additional locations throughout each building.
- Handwashing facilities are available in the restrooms for all locations.

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

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

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained.

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

Investigating and Responding to COVID-19 Cases

This will be accomplished by using **Appendix C: Investigating and Responding to COVID-19 Cases**. Employees who had potential COVID-19 exposure in our workplace receive the following:

- Notification of possible exposure, which contains information regarding locations of free testing sites.
- Testing to be performed during employee's working hours
- Mileage reimbursement available

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 shall immediately report Covid-19 symptoms and possible hazards to their supervisor or Human Resources.
- The employee is advised to stay home and self-quarantine for 14 days and symptoms resolve.
- Employees report symptoms or positive test results to <u>hrteam@compasscharters.org</u>
- Employees can report symptoms and hazards without fear of reprisal.
- Workplace hazards associated with COVID-19 can be reported directly to the HR Dept. at: <u>hrteam@compasscharters.org</u>
- Our procedures or policies for accommodating employees with medical or other conditions put them at increased risk of severe COVID-19 illness.
- Employees can access COVID-19 testing by notifying their personal physician, or through local testing centers.
- In the event CCS is 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.
- 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.

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 infected 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 handwashing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

COVID-19 training records, for all required training, are maintained by the Department of Human Resources and are referenced in **Appendix D**.

Exclusion of COVID-19 Cases

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Ensuring that COVID-19 cases are excluded from the workplace until our returnto-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 10 days after the last known 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.
- Information on employee benefits is available through Human Resources at https://www.hrteam@compasscharters.org.

Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report information about <u>all</u> COVID-19 cases at our workplace to our Worker's Compensation carrier.
- 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 section3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and representatives of Cal/OSHA immediately upon request.

Use **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 100.4 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 has 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.

"COVID-19 symptoms" means the following unless a licensed health care professional determines the person's symptoms were caused by a known condition other than COVID-19.

- fever of 100.4 degrees Fahrenheit or higher
- 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, or diarrhea,

"COVID-19 test" means a viral test for SARS-CoV-2 that is:

(1) Approved by the United States Food and Drug Administration (FDA) or has an Emergency Use Authorization from the FDA to diagnose current infection with the SARS-CoV-2 virus; and (2) Administered in accordance with the FDA approval or the FDA Emergency Use Authorization as applicable.

"Exposed workplace" means any work location, working area, or common area at work used or accessed by a COVID-19 case during the high-risk period, including bathrooms, walkways, hallways, aisles, break, or eating areas, and waiting areas. The exposed workplace does not include buildings or facilities not entered by a COVID-19 case.

Effective January 1, 2021, the "exposed workplace" also includes but is not limited to the "worksite" of the COVID-19 case as defined by Labor Code section 6409.6(d)(5).

"Face covering" means a tightly woven fabric or non-woven material with no visible holes or openings, which covers the nose and mouth.

"High-risk exposure period" means the following time period:

(1) For persons who develop COVID-19 symptoms: from two days before they first develop symptoms until 10 days after symptoms first appeared, and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved; or

(2) For persons who test positive who never develop COVID-19 symptoms: from two days before until ten days after the specimen for their first positive test for COVID-19 was collected.

Identification and evaluation of COVID-19 hazards

We will implement the following in our workplace:

• Employee and authorized employee representative participation in the identification and evaluation of COVID-19 hazards.

• A process for screening employees for and responding to employees with COVID-19 symptoms.

CCS may ask employees to evaluate their own symptoms before reporting to work. If CCS conducts screening at the workplace, CCS shall ensure that face coverings are used during screening by both screeners and employees and, if temperatures are measured, that non-

contact thermometers are used.

- All employees must complete a symptom screening questionnaire via google form each morning upon arrival
- Employees may use a touchless thermometer upon entry to the worksite or take their temperature prior to coming to work.
- Employees showing symptoms will be asked to return home or stay home and enter the decision tree protocol.

COVID-19 policies and procedures to respond effectively and immediately to individuals at the workplace who are a COVID-19 case to prevent or reduce the risk of transmission of COVID-19 in the workplace.

Conduct a workplace-specific identification of all interactions, areas, activities, processes, equipment, and materials that could potentially expose employees to COVID-19 hazards.

CCS shall treat all persons, regardless of symptoms or negative COVID-19 test results, as potentially infectious, including:

- Identification of places and times when people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not, for instance during meetings or training and including in and around entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.
- An evaluation of employees' potential workplace exposure 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. CCSs shall consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.
- For indoor locations, evaluate how to maximize the quantity of outdoor air and whether it is possible to increase filtration efficiency to the highest level compatible with the existing ventilation system.
- Review applicable orders and guidance from the State of California and the local health department related to COVID-19 hazards and prevention, including information of general application and information specific to Compass Charter School's industry, location, and operations.

Evaluate existing COVID-19 prevention controls at the workplace and the need for different or additional controls.

- 1. Conduct workplace-specific evaluations using Appendix A: Identification of COVID 19 Hazards form.
- 2. Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- 3. 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.
- 4. Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- 5. Conduct periodic inspections using 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.

Correction of COVID-19 hazards

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

Unsafe or unhealthy work conditions, practices or procedures will be documented on **Appendix B: COVID-19 Inspections** form, and corrected in a timely manner based on the severity of the hazards, by reporting to the site administrator. The site administrator is responsible for rectifying the concern and/or referring it to the appropriate department leader.

Testing Cadences

CDPH recommendations

A) Diagnostic testing

- Considered for all individuals with symptoms or exposure to COVID-19.
- B) Diagnostic screening testing
 - Recurrent testing of asymptomatic individuals in certain high-risk non-healthcare and healthcare settings to detect COVID-19 early and stop transmission quickly.
 - Schools are not considered high-risk settings, but residential schools will be considered congregate residential settings.
 - Fully vaccinated individuals do not need to undergo diagnostic screening testing in nonhealthcare setting workplaces.

Screening testing frequency with molecular tests

The recommended minimum molecular test screening frequency is once weekly. Molecular testing as a screening tool is most effective when turnaround times are short (<2 days).:

CCS will also test staff when there are multiple COVID-19 cases or major outbreaks based on Cal/OSHA requirements:

- All exposed employees shall be tested immediately and once per week thereafter when three or more COVID-19 cases in an exposed workplace within a 14-day period
- If there are twenty or more COVID-19 cases in an exposed workplace within a 30-day period, then all exposed employees will be tested twice per week, or

more frequently if recommended by the San Diego County Department of Health

Engineering and Administrative Controls

Partitions

At fixed work locations where it is not possible to maintain the physical distancing requirement at all times, the District will install cleanable solid partitions that effectively reduce aerosol transmission between the employee and other persons.

Maximize Outdoor Air

For buildings with mechanical or natural ventilation or both, the District will maximize the quantity of outside air provided to the extent feasible, except when the United States Environmental Protection Agency (EPA) Air Quality Index is greater than 100 for any pollutant or if opening windows or letting in outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.

Cleaning and Disinfecting

The District has implemented cleaning and disinfecting procedures, which require:

- Identifying and regularly cleaning and disinfecting frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, bathroom surfaces, and steering wheels. The District will inform employees and authorized employee representatives of cleaning and disinfection protocols, including the planned frequency and scope of regular cleaning and disinfection.
- Prohibiting the sharing of personal protective equipment and to the extent feasible, items that employees come in regular physical contact with such as phones, headsets, desks, keyboards, writing materials, instruments, and tools. When it is not feasible to prevent sharing, sharing shall be minimized and such items and equipment shall be disinfected between uses by different people.
- Cleaning and disinfection of areas, material, and equipment used by a COVID-19 case during the high-risk exposure period.

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

- Scholar/staff is sent home if not already quarantined:
- Scholar/staff is instructed to isolate for 10 days after symptom onset, 24 hours fever free without fever medication and symptoms have improved If never symptomatic, isolate for 10 days after the date of a positive test.
- School-based close contacts identified and recommend to test & quarantine for 14 days from the last date of exposure to positive individual
 - \circ $\;$ In stable elementary classroom stable groups: identified close contacts $\;$

- In other settings: use seating chart, consult with teacher/staff
- School administration, District Nurse and scholar Services notified
- Public Health Department notified

Closing off areas used by any sick person and do not use the room before cleaning/disinfecting:

- To reduce risk of exposure, waiting 24 hours before cleaning/disinfecting, but if it's not possible, waiting as long as practicable
- Ensuring a safe and correct application of disinfectants as trained using PPE and ventilation recommended for cleaning
- Keeping disinfecting product from scholars

Handwashing Facilities

To protect employees from COVID-19 hazards, the District will evaluate its handwashing facilities, determine the need for additional facilities, encourage and allow time for employee handwashing, and provide employees with an effective hand sanitizer. CCSs shall encourage employees to wash their hands for at least 20 seconds each time. Provision or use of hand sanitizers with methyl alcohol is prohibited.

Handwashing and Respiratory Etiquette

- People should practice handwashing and <u>respiratory etiquette</u> (covering coughs and sneezes) to keep from getting and spreading infectious illnesses including COVID-19. Schools can monitor and reinforce these behaviors and provide adequate hand washing supplies.
- Teach and reinforce <u>handwashing</u> with soap and water for at least 20 seconds.
- Remind everyone in the facility to wash hands frequently and assist young children with handwashing.
- If handwashing is not possible, use a hand sanitizer containing at least 60% alcohol (for teachers, staff, and older students who can safely use hand sanitizer). Hand sanitizers should be stored up, away, and out of sight of young children and should be used only with adult supervision for children under 6 years of age.
- Scholars and staff should use hand sanitizer when handwashing is not practicable. Sanitizer must be rubbed into hands until completely dry.
- Hand sanitizer stations have been installed inside all classrooms.

Personal Protective Equipment

- 1. The District will evaluate the need for personal protective equipment to prevent exposure to COVID 19 hazards, such as gloves, goggles, and face shields, and provide such personal protective equipment as needed.
- 2. The District will evaluate the need for respiratory protection in accordance with section

5144 when the physical distancing requirements are not feasible or are not maintained.

- 3. The District will provide and ensure the use of respirators in accordance with section 5144 when deemed necessary by the Division through the Issuance of Order to Take Special Action, in accordance with title 8 section 332.3.
- 4. The District will provide and ensure the 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.

In the Case of Multiple COVID-19 Infections and COVID-19 Outbreaks

This section of CPP is only applicable if a workplace in the district 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 a workplace within a 14- day period. This section will stay in effect until there are no new COVID-19 cases detected in the affected 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.
 - $\circ~$ 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.
 - \circ $\;$ 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.

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.
 - $\circ~$ 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.

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 CCSs
- Existing and/or additional COVID-19 prevention controls, including barriers, partitions, and ventilation

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):
- Handwashing facilities (adequate numbers and supplies):
- Disinfecting and hand sanitizing solutions being used according to manufacturer:
- 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/scholars, 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:
- Name of Person Conducting the Investigation:
- Employee (or non-employee*) name:
- The location where the employee worked (or non-employee was present in the workplace):
- Was the COVID-19 test offered?
- Date and time the COVID 19 case was the last present in the workplace:
- Occupation (if non-employee, why they were in the workplace):
- Date investigation was initiated:
- Name(s) of staff involved in the investigation:
- 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):
- Notice is 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 have had COVID-19 exposure and their authorized representatives.
- Independent contractors and other CCSs present at the workplace during the high-risk exposure period.
- What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?
- Date:
- Names of employees that were notified:
- Date:
- Names of individuals that were notified:
- What could be done to reduce exposure to COVID-19?
- Was the local health department notified?
- Date:

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

Appendix D: COVID-19 Training Roster

All OCLC staff have completed OSHA and Safe Schools training and using disinfectant training under The Healthy Schools Act

Coronavirus Awareness

- Coronavirus CDC Guidelines for Making & Using Cloth Face Covering
- Coronavirus Cleaning & Disinfecting Your Workplace
- Coronavirus Reopening your organization (Supervisors only

OSHA