COVID-19 Prevention Program (CPP)
Monterey County Office of Education
COVID-19 Prevention Program (CPP) for Monterey County Office of Education

This CPP is designed to control exposures to the COVID-19 virus that may occur in the workplace.

Date: January 11, 2021, Updated June 21, 2021

CPP will be housed on montereycoe.org homepage. A physical copy can be found at 901 Blanco Circle, Salinas, CA 93901 in the Superintendent’s Office.

Authority and Responsibility

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

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

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Evaluate employees’ potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the Appendix B: COVID-19 Inspections form as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures. Sites with more frequent use are inspected more frequently than those with less use.

  o MCOE-owned Sites:
    - Arthur B. Ingham School
    - Bard Blades School
    - Bolsa Knolls Middle School - James Stefan Building
    - Gabilan School
    - Greenfield Children’s Center
    - Ruth Andresen School
    - Toro Park School for the Deaf/Hard of Hearing

  o MCOE Employees also work onsite at facilities not owned by MCOE. MCOE will work with the facility owner to find resolutions to any issues.

  o Parties responsible for inspections
    - Director of Maintenance Operations, Manager of Maintenance Operations, Maintenance Custodian(s), and Custodian(s)

Employee participation

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

- Employees and authorized employees’ representatives are encouraged to participate in the identification and evaluation of potential COVID-19 hazards by maintaining ongoing reciprocal verbal and written communication with administration. Union leadership also regularly meets with Human Resources and can bring attention to COVID-19 concerns.
- Employees are encouraged to report to their supervisor and/or Human Resources any activities or behaviors that are not in accordance with the health and safety protocols and requirements (i.e. not wearing face
coverings, etc.). Regularly scheduled staff meetings include reminders of the health and safety protocols and provide an opportunity for feedback.

- MCOE Safety Committee was previously established to inspect school sites and workplace safety related matters. The Chief Officer of General Services and Business Support will provide reports to the Safety Committee on a regular basis.
  - The Committee is made up of representatives from classifications including: custodian, bus driver, secretary, admin assistant, paraprofessional, teacher, instructional aid, certificated and classified management

**Employee screening**

All staff will be expected to follow Monterey County Health Department and California Department of Public Health orders and guidelines for physical distancing, face covering and hygiene, plus additional measures as noted below:

- Perform the MCOE Daily Wellness Check daily. This is a self-check/symptom screening that employees submit daily when arriving to work. Employees in the Early Learning Program are required to complete the Wellness Check prior to arriving to work in accordance with licensing requirements.

- Employees are encouraged to evaluate their own health and monitor any symptoms before reporting to work.

**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:

- Immediate resolution to a severe hazard such as broken or damaged partitions and/or panels by site Maintenance Custodian
- Immediate restocking of PPE or sanitizer supplies by site Maintenance Custodian
- Issuance of work order for items that require repair or replacement but are less severe by Director/Manager of Maintenance and Operations
- Communicate repairs and timeline with site principal

**Control of COVID-19 Hazards**

**Physical Distancing**

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

- MCOE continues to be closed to the public; does not allow outside visitors onto MCOE campuses/sites (exception: essential workers who have been pre-approved)
- Limit contact with staff members as much as possible
- Enter and exit the building at the entrance closest to your office/work station
- All workstations should be 6 feet apart. When workstations are closer than 6 feet, modifications will be required prior to returning to worksite
- Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved
- Utilize telework when necessary

**Face Coverings**

MCOE will ensure that facemasks 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.

- MCOE employees are required to wear face masks at all times, immediately after exiting your car, when entering the building, moving throughout the building, when visiting the restroom and whenever in congregated areas where a 6 foot distance is not maintained
- You may remove your face mask while at your workstation if you share a communal/shared workspace if a 6 foot distance is maintained
MCOE will ensure all employees adhere to CDPH face coverings guidance.

- Cloth face masks should be washed or cleaned regularly
- MCOE will have facemasks available for employees who need one.

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

- When an employee is alone in a room.
- When 6 feet distance can be maintained.
- While eating and drinking at the workplace, provided employees are at least six feet apart
- 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.

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.

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

- Develop new and expanded housing of staff throughout the campus:
  - Rooms such as break out spaces, meeting rooms etc are to be used to establish temporary work spaces for those who can not properly socially distance in their normal location
- Install barriers including both opaque and translucent barriers in areas where social distancing is acceptable, but the potential for foot traffic could pose a proximity issue.

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

- Merv13 filters used at all MCOE owned buildings
- AeraMax Air purifiers were provided for all MCOE work spaces

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

- Disinfecting wipes and sanitizer is available throughout all of the MCOE buildings
- Full disinfecting and sanitizing done twice daily to all touch points, work surfaces and common areas
- Disinfecting on all high touch points (e.g. door handles, door push/pull devices...etc.) frequently

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

- When a COVID-19 case has been identified at the workplace, the work space will be deep cleaned immediately by the COVID-19 response team
- Communication is sent out immediately by the Employee Health & Wellness Coordinator of MCOE to notify potential contact
- Center or building is closed for a period of time as specified by the current CDPH guidance

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 last staff member using the item.

Sharing of vehicles will be minimized to the extent feasible, however if a vehicle is to be shared, the vehicle will
be disinfected between uses by the last staff member using the vehicle. A vehicle use log is maintained for each fleet vehicle and school bus that identifies use, and has an area for additional PPE requests within the vehicle and maintained by Transportation.

**Hand sanitizing**
In order to implement effective hand sanitizing procedures, we:
- MCOE had previously evaluated handwashing facilities for location and capacity needs
- MCOE has placed additional touchless hand sanitizing stations throughout all MCOE Program locations for close proximity to classrooms, communal areas, etc.
- MCOE has placed signage in restrooms and staff lounges that encourage employees to wash their hands for at least 20 seconds each time

**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.

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:
- Offered COVID-19 testing at no cost during their working hours.
- Employees will be re-sent the information on benefits described below in the **Training and Instruction** and **Exclusion of COVID-19 Cases** sections below will be provided to them.

**System for Communicating**
Our goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and that it includes the following information:
- Employees should report COVID-19 symptoms and possible hazards to Suzy Covarrubias, Employee Health & Wellness Coordinator via telephone at 831-755-0314 or via email at sucovarrubias@montereycoe.org
- Employees can report symptoms and hazards without fear of reprisal.
- Employees with medical or other conditions that put them at increased risk of severe COVID-19 illness shall work with Human Resources to find a solution that will accommodate their condition while allowing for full job responsibilities to be met.
- Employees receive a weekly update which includes COVID-19 data for Monterey County and any other pertinent COVID-19 information needed
- Local Testing sites are available on both the county and state websites and are available to employees within the COVID-19 training slideshow. MCOE also offers onsite testing at MCOE Main and Gabilan School in King City. For questions on testing, please contact the COVID-19 Testing team at (831) 755-0381 extensions 158 or 159.
- 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.

**Training and Instruction**
We will continue to provide effective training and instruction through InformedK12 and Zoom trainings that include:
- 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:
  o COVID-19 is an infectious disease that can be spread through the air.
  o COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
  o 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.

InformedK12 is used to verify all MCOE employees have received and reviewed the training. The list is managed by Suzy Covarrubias, Employee Health & Wellness Coordinator.

Employees/departments/divisions can request additional trainings via Zoom by contacting Jessica Hull, Communications and Public Relations Officer at 831-784-4245 or jhull@montereycoe.org.

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 unvaccinated employees with COVID-19 exposure from the workplace for 14 10 days after the last known COVID-19 exposure to a COVID-19 case.
• MCOE will continue compensation, rights, and benefits (including seniority and right to return to former job), if an excluded employee is able and available to work when it has been demonstrated that the COVID-19 exposure is work related. All employees at the time of exclusion will be provided with information on available benefits.
• The employee may be eligible for the COVID-19-related accommodation/benefits listed below.

<table>
<thead>
<tr>
<th>Type of Accommodation/Benefit</th>
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<tbody>
<tr>
<td>Telework</td>
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<tr>
<td><strong>Supplemental Paid Sick Leave (Expires 09/30/2021)</strong></td>
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<tr>
<td>Up to 12 workweeks of leave pursuant to the Family and Medical Leave Act (FMLA) and the California Family Rights Act (CFRA)</td>
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<tr>
<td>Up to 60 workdays of Worker’s Compensation / Industrial Accident Leave Sick Leave</td>
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<tr>
<td>Sick Leave</td>
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</tbody>
</table>
Reporting, Recordkeeping, and Access

It is our policy to:

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

Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
  - At least 24 hours have passed since a fever of 100.4 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.

Plan approved by Dr. Deneen Guss, Monterey County Superintendent of Schools

_______________________________________________
Signature

________06/21/2021________
Date
Appendix A: Identification of COVID-19 Hazards

All persons, regardless of symptoms or negative COVID-19 test results, will be considered potentially infectious. Particular attention will be paid to areas where people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not. For example: meetings, entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

Evaluation of potential workplace exposure will be to all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

Person conducting the evaluation: General Services Management Staff

Date:

Name(s) of employee and authorized employee representative that participated:

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

Date: ____________________________________________________________

Name of person conducting the inspection: ____________________________________________________________

Work location evaluated: ____________________________________________________________

<table>
<thead>
<tr>
<th>Exposure Controls</th>
<th>Status</th>
<th>Person Assigned to Correct</th>
<th>Date Corrected</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building and Grounds</td>
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<tr>
<td>Barriers/partitions</td>
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<tr>
<td>Ventilation (amount of fresh air and filtration maximized)</td>
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<tr>
<td>Additional room air filtration</td>
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<tr>
<td>UV lighting for disinfection</td>
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<tr>
<td>Administrative</td>
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<tr>
<td>Physical distancing barriers and signage</td>
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<td></td>
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<tr>
<td>Surface cleaning and disinfection</td>
<td></td>
<td></td>
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<tr>
<td>Hand washing facilities (adequate numbers and supplies)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Disinfecting and hand sanitizing solutions being used according to manufacturer instructions</td>
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<tr>
<td>Stocked Supplies on Site for immediate deployment</td>
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<tr>
<td>PPE (not shared, available and being worn)</td>
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<tr>
<td>Face coverings (cleaned sufficiently often)</td>
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<tr>
<td>Gloves available</td>
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<td></td>
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<tr>
<td>Face shields/goggles available</td>
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<tr>
<td>Respiratory protection as required for task</td>
<td></td>
<td></td>
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</tbody>
</table>
Appendix C: Investigating COVID-19 Cases

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

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

Name of person conducting the investigation: Suzy Covarrubias

<table>
<thead>
<tr>
<th>Source # (for reporting of positive cases to InterCare):</th>
<th>Employee Name:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department:</td>
<td>Site(s) (locations where employee works):</td>
</tr>
<tr>
<td>Classification:</td>
<td>Reason of the concern/report:</td>
</tr>
<tr>
<td>Date the employee was contacted by HR:</td>
<td>Exposure Date (if known):</td>
</tr>
<tr>
<td>Was the employee tested for COVID-19?:</td>
<td>Date test was taken:</td>
</tr>
<tr>
<td>Test results:</td>
<td>Date results were received</td>
</tr>
<tr>
<td>Will employee need to self quarantine:</td>
<td>Maximum # of employees at each site:</td>
</tr>
<tr>
<td>Work Location(s) and addresses</td>
<td>Possibly work related?:</td>
</tr>
<tr>
<td>Is the Employee Fully Vaccinated?</td>
<td></td>
</tr>
<tr>
<td>NOTES: Results of the evaluation. When was the employee last at the worksite and who may have been exposed. How was the employee exposed? Are they experiencing any symptoms? If so, when did they start? When can the employee return to the worksite? Can they work from home during the quarantine period.:</td>
<td></td>
</tr>
</tbody>
</table>
Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

[This section will need to be added to your CPP if your workplace is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in your workplace within a 14-day period. Reference section 3205.1 for details.]

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 testing

- We will provide COVID-19 testing to all unvaccinated 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 unvaccinated 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.
  - Vaccinated employees who develop symptoms will also be tested.

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 that may discourage an employee 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:
  ○ Increasing outdoor air supply when work is done indoors.
  ○ Improving air filtration.
  ○ Increasing physical distancing as much as possible.
  ○ Respiratory protection.
  ○ Moving indoor tasks outdoors or having them performed remotely.

Notifications to the local health department

- As soon as possible, (but no longer than 48 hours after learning of three or more COVID-19 cases in our workplace), we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- We will provide to the local health department the total number of COVID-19 cases and for each COVID-19 case, the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and North American Industry Classification System code of the workplace of the COVID-19 case, and any other information requested by the local health department. We will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace.
Additional Consideration #2

Major COVID-19 Outbreaks

[This section will need to be added to your CPP should your workplace experience 20 or more COVID-19 cases within a 30-day period. Reference section 3205.2 for details.]

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 testing

We will provide twice a week COVID-19 testing, or more frequently if recommended by the local health department, to all unvaccinated 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.