

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:
 - [3205, COVID-19 Prevention](#)
 - [3205.1, Multiple COVID-19 Infection and COVID-19 Outbreaks](#)
 - [3205.2, Major COVID-19 Outbreaks](#)
 - [3205.3, Prevention in Employer-Provided Housing](#)
 - [3205.4, COVID-19 Prevention in Employer-Provided Transportation to and from Work](#)
 - 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/



November 2020

COVID-19 Prevention Program (CPP) for Our Mother of Good Counsel School

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

Date: 02/16/2021

Authority and Responsibility

Kevin Komenkul and Wendy Lucas 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:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the **Appendix B: COVID-19 Inspections form** as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.
- **Follow protocols by the CA Department of Health.**

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: **reporting any concerns to the administration in a timely manner. The COVID-19 Compliance Team consists of the principal, school secretary, and staff members. The COVID-19 Compliance Team is responsible for establishing and enforcing all COVID-19 safety protocols, ensuring the staff and students receive education about COVID-19. Mr. Komenkul, the school principal, serves as the liaison to the Department of Public Health in the event of an outbreak on campus.**

Employee screening

We screen our employees by:

Staff members are responsible for screening themselves at home for symptoms of COVID-19, including fever, cough, shortness of breath or difficulty breathing, chills, muscle pain, sore throat, or new loss of taste or smell.

- **Anyone with symptoms consistent with COVID-19 should remain at home in isolation for a minimum of 10 days, including at least 72 hours without a fever and improvement of other symptoms.**
- **Staff members with a fever of 100.4°F or above, who show symptoms of coughing, fatigue or shortness of breath, or who display other COVID-19 symptoms will be asked to leave campus**

immediately. If they cannot and need to wait for transportation, there is an isolation area for them to wait.

- **Staff members must notify school if they or any other household member tests positive for COVID-19. In such a situation, they may not return to school until they are allowed to exit self-isolation or self-quarantine under the County Health Orders.**
- **At school, staff members will be asked the same health questions, as well as given a temperature check. Furthermore, 25% of the staff are tested weekly and as needed.**

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:

Staff must abide by health and safety guidelines. If they do not abide by social distancing, mask-wearing, and other health and safety guidelines to reduce the spread of COVID-19, disciplinary actions will be taken, ie. written warning.

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:

1. SPECIFIC CHANGES AT THE SCHOOL LEVEL

- **Physical Distancing Outside the Classroom:**
 - ○ **Floor markings are in the yard for pick up and drop off.**
 - ○ **Floor markings are outside the front offices if a person needs to speak with the secretary and/or principal.**
 - ○ **Teachers and staff will ensure that students are maintaining social distance when outside during recess and inside in the hallway in line.**
 - ○ **Outside benches are labeled so students are sitting six feet apart.**
- **Closed Campus: NO non-essential people on campus. Use of school facilities for non-school purposes is not permitted.**
- **Cohorts: Students will be kept in classroom cohorts**

• Specific communal spaces (Library/Computer Lab) on campus will remain closed. Only office staff can enter if something is needed so we can track areas that people have been in, in case of a possible outbreak. Office staff must disinfect all appliances touched.

SPECIFIC CHANGES IN THE CLASSROOMS

• Social Distancing: Class activities will be structured to allow for as much social distancing as possible, including multiple recess and lunch periods, eating lunch in the outdoors when possible (weather permitting) desk arrangements, desk partitions, etc. Water bottle usage only as water fountain usage is off limits.

Markings on floors and signage will be around the classroom in order to promote distancing. Floor markers will be placed around the classroom to maintain a traffic flow throughout the classroom, including exit and entrance door signs and distance between students for lining up.

Hand-washing, social distancing, and disinfecting posters will be posted for daily reference. Multiple Recesses & Lunch Periods: Recess is a time for the students to leave the classrooms to enjoy the fresh air, use the restroom, wash their hands, and safely socialize with their friends. In addition, students will be able to engage in physical activities. Recess and lunch will be staggered. They will play in assigned play areas with only their own class. Every effort will be made so that students will not mingle with other students during playtime (i.e. we will play music so students can dance 6 feet apart; students can play with individual hula hoops; students can bring their individual equipment).

SPECIFIC CHANGES AT DROP-OFF & PICK-UP

- o ● **Access to School Building:**
 - ○ **Teachers & staff: must enter the school building THROUGH THE FRONT GATES (social distancing) after proper health checks from the office (mandatory health screening questions & temperature checks).**
 - ○ **Students: may only enter the school building after proper health checks THROUGH THE SCHOOL YARD DURING DROP-OFF or THROUGH THE FRONT OFFICE IF LATE (social distancing).**
 - ○ **Parents: If parents need to enter to speak to the front office, they must speak through the intercom. If approved to enter, they may do so after proper health checks. MAJORITY OF BUSINESS CAN TAKE PLACE OUTSIDE THE SCHOOL GATES WITHOUT COMING IN.**

Drop Off:

Staggered times (Multiple students will be dropped off at the times of the YOUNGEST child):

All car drop-off must occur in the school yard. Cars enter through the Dracena gate, go through cones that will guide them through the yard, cars will stop at designate area to drop off students (students vacate on their own or parents can help quickly AFTER health screening), and exit through Ambrose gate. Parents are not permitted to stop or socialize on school grounds. Staff will be checking temperature 6-feet away while students are still in the cars. If their temperature is 100.4 degrees Fahrenheit or above, they will be asked to leave. Health questions will also be asked at this time.

If their temperature is below 100.4, they may enter the school building and walk directly to the classroom with masks and social distancing, where their teachers will be. Study hall and independent work will occur between 8:00 and 8:45.

- **8:00-8:15 TK-2**
- **8:15-8:30 3-5**
- **8:30-8:45 6-8**

Dismissal/Pick-up:

Staggered times (Multiple students will be picked-up at the times of the YOUNGEST child):

Students will be picked up through a car line at the times indicated below. Students will safely sit six feet apart at lunch tables (indicated with markings). Principal or designated staff member will call for student as cars approach. Students will walk into their vehicles. Parents and students will not be permitted to stop, gather, and socialize. Students who are walking leave will check out with secretary through the front office.

- **2:15-2:30 TK-2 pick up**
- **2:30-2:45 3-5 pick up**
- **2:45-3:00 6-8 pick up**

● **Early Leave: When leaving early, parents must park on Ambrose Ave in front of the office and call for early pick-up. The student will go out the front doors where parents are waiting. The parent will scan a QR code at the front office and complete the quick form to electronically sign the student out.**

● **Tardies: When arriving late, only students will be allowed to walk through the front doors (after proper health and temperature checks). Parents must remain outside. The office will make note on Gradelink of the tardy.**

Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department. **Staff & students will bring their own masks. However, disposable masks are available in the school office and in all of the classrooms.**

Everyone who enters the school grounds must wear face coverings on campus at all times (this includes the school yard). Parents should have on face coverings during all drop-offs and pickups. Students may only remove their face coverings when eating and drinking.

● **Guidelines:**

- **A face mask must be at least 2-ply cloth**
- **Reusable masks should be taken home and cleaned daily**
- **Any misplaced masks will be discarded after each day**
- **Parents are responsible for teaching their children how to properly wear and care for their face masks**
- **We require students to have at least two clean masks with them every day**

Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

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

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

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19.

Engineering controls

We implement the following measures for situations where we cannot maintain at least six feet between individuals: **Everyone must wear face coverings. We have student desk barriers to ensure that if students move around in their desks, there is still a barrier between each of them.**

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

- **All doors and windows will be opened during the school day to provide proper ventilation and air circulation.**
- **Classroom HVAC pull in fresh outside air to increase ventilation of classrooms. We are maintaining all HVAC units.**

Cleaning and disinfecting

We implement the following cleaning and disinfection measures for frequently touched surfaces:
Upon reopening, OMGC is required to maintain safety by continuously cleaning and disinfecting per the chart below.

Category	Frequency
<p>WORKSPACE (9 classrooms, 2 offices) & ELECTRONIC EQUIPMENT:</p> <p>Teachers during the day in each classroom & admin in each office: sanitize doorknobs, light switches, desks, chairs, supplies, remotes, computer, printer, markers, white boards, phones & fax machine (in office), and other generally used objects.</p> <p><u>Cleaning Company</u> at the end of each day in all 9 workspaces: Sweep; mop; empty trash cans; sanitize each desk, chairs, windowsills; change liners; wash ALL garbage cans every Friday or whenever there is liquid, food, etc. that can cause flies.</p>	<p>At the end of each use and daily</p> <p>General used objects - at least 4 times a day</p>
<p>Appliances (i.e., refrigerators, microwaves)</p> <p>FACULTY LOUNGE:</p> <p><u>Cleaning Company</u> at the end of the day: Disinfect & sanitize appliances in faculty lounge (refrigerator, microwave, Keurig, oven, water dispenser) and other generally used items, such as light switches, doorknobs, windowsills, etc; sweep; mop; empty trash cans; change liners; wash ALL garbage cans every Friday or whenever there is liquid, food, etc. that can cause flies - PAPER TOWEL AND SPRAY BOTTLES ARE AT THESE STATIONS AND EVERYONE MUST SANITIZE AFTER EACH USE.</p> <p>WATER BOTTLE STATION BY THE OFFICE - ALL OTHER DRINKING FOUNTAINS WILL BE TAPED OFF AND ARE OFF LIMITS.</p> <p><u>Cleaning Company</u> at the end of each day: Sanitize & disinfect</p>	<p>Daily</p>
<p>General Used Objects (i.e., door handles, light switches, hand rails, doorknobs)</p>	<p>At least four times a day by teacher/staff member</p>
<p>STUDENT AND TEACHER RESTROOMS & FAUCETS (TEACHER RESTROOM IN OFFICE AND FACULTY LOUNGE; RESTROOMS FOR 1-4 AT ALL TIMES (EVEN DURING LUNCH AND RECESS); RESTROOMS UPSTAIRS FOR 5-8 AT ALL TIMES (EVEN DURING LUNCH AND RECESS); CAPACITY ALLOWED IN EACH IS 50% WITH EVERY OTHER STALL UNAVAILABLE. EVERYONE ELSE MUST WAIT OUTSIDE 6-FEET APART. THERE ARE MARKERS TO INDICATE THIS DISTANCE)</p>	<p>Two times a day</p>

<p>Staff member periodically AND at the end of each day: Sweep; mop; empty trash cans; sanitize and clean all stalls, toilets, sinks, knobs, doors, window sills; change liners; wash ALL garbage cans every Friday or whenever there is liquid, food, etc. that can cause flies; replenish supplies as needed</p>	
<p>Common Areas</p> <p>COPY ROOM:</p> <p>Staff members throughout the day: Sanitize electronic equipment (copier); take out garbage by copier as needed - PAPER TOWEL AND SPRAY BOTTLES ARE AT THESE STATIONS AND EVERYONE MUST SANITIZE AFTER EACH USE.</p> <p><u>Cleaning Company</u> at the end of the day: On Friday only - Sweep and mop floors; take out garbage</p> <p>LUNCH TABLES:</p> <p>Staff members outside after each use: Sanitize & Disinfect</p> <p><u>Cleaning Company</u> at the end of the day: Sanitize & Disinfect</p> <p>JANITOR CLOSET, TEACHER SUPPLY CLOSET, OFFICE SUPPLY CLOSET: PAPER TOWEL AND SPRAY BOTTLES WILL BE AT THESE STATIONS AND EVERYONE MUST SANITIZE AFTER EACH USE.</p> <p><u>Cleaning Company</u> at the end of the day: Disinfect & Sanitize HALLWAYS & STAIRS:</p> <p><u>Cleaning Company</u> at the end of each day: Sweep; mop; sanitize; vacuum all carpets in the hallway by entrances; garbage cans - change liners; wash</p>	<p>At the end of each use and day</p>

ALL garbage cans every Friday or whenever there is liquid, food, etc. that can cause flies.

All classrooms will be cleaned as classes go out to their staggered recess and lunch times, as well as at the end of the school day. Each classroom and school offices will have protective equipment and cleaning supplies for use and distribution as needed, extra masks, face shields, wipes for disinfecting, hand sanitizer, bleach spray, and paper towels.

All cleaning supplies will be in compliance with the approved disinfectants. Staff members, teachers, and our cleaning company have been trained in best practices for both cleaning and disinfecting. They have reviewed the latest guidance for cleaning and disinfecting public places.

In the classroom all students will have their own items. For example, students will have their own pencils, crayons, markers, scissors and a bag of classroom manipulatives. All items will be stored in the students' desks. If items have been shared, they will be cleaned between uses and all students will be required to wash their hands. Whenever possible, teachers will try to be "paperless" and submit assignments and work digitally to reduce contact exposure.

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

Disinfecting and sanitizing of all areas affected will begin promptly after a confirmed case through an outside service. Immediately following an exposure, the CDC recommends closing off areas used by the ill person and waiting 24 hours or as long as possible before beginning to clean and disinfect, opening doors and windows to improve air circulation.

After cleaning off any obvious dirt from the area, the cleaning crew will disinfect shared spaces using diluted household bleach, alcohol solutions with at least 70 percent alcohol, or household disinfectants effective against the coronavirus. Cleaning crews will wear gloves and wash their hands immediately after removing the protective gear.

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 details in the chart above.**

Hand sanitizing

In order to implement effective hand sanitizing procedures, we: **will continue to teach and reinforce washing hands, avoiding contact with one's eyes, nose, and mouth, and covering coughs and sneezes among students and staff. We will teach and reinforce use of cloth face coverings, masks, or face shields, as well as other social distancing protocols throughout the day.**

Students and staff are given frequent opportunities to wash their hands for 20 seconds with soap, rubbing thoroughly after application and using paper towels to dry hands thoroughly. Frequently scheduled mandatory handwashing breaks or opportunities (especially for younger students) will occur at minimum:

- **before and after eating**
- **after using the restroom**
- **after outdoor play**

Staff members are instructed to model and monitor frequent and proper handwashing. Handwashing is the preferred method for maintaining proper hygiene. Approved hand sanitizers can be used as a substitute when hand-washing is not possible.

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 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. [Delete if not applicable to your workplace.]

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:

- **The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to them.**

- **If staff thinks they may be experiencing COVID-19 symptoms or have been exposed to someone who tested positive for COVID-19, they must call their primary care provider to schedule a COVID-19 test. COVID-19 symptoms include: fever, cough, difficulty breathing, chills, repeated shaking with chills, muscle pain, headache, sore throat, and/or new loss of taste or smell.**
- **When needed, staff should receive testing in consultation with their healthcare provider to ensure continuity of care & optimal follow-up. All staff members will be given time off as needed to be tested. For testing, they will visit [covid19.lacounty.gov/testing](https://www.covid19.lacounty.gov/testing) or contact their primary healthcare provider.**

System for Communicating

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

- Who employees should report COVID-19 symptoms and possible hazards to, and how: **Speak to principal about symptoms via phone, email, or in-person 6 feet apart.**
 - That employees can report symptoms and hazards without fear of reprisal.
 - Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- 1. Where testing is not required, how employees can access COVID-19 testing :
 - **Visit [covid19.lacounty.gov/testing](https://www.covid19.lacounty.gov/testing) or contact their primary healthcare provider.**
 - 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.
 - 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 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.

Appendix D: COVID-19 Training Roster will be used to document this training.

Exclusion of COVID-19 Cases

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished by **employer-provided employee sick leave benefits**.
- time of exclusion with information on available benefits.

Reporting, Recordkeeping, and Access

It is our policy to:

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

Return-to-Work Criteria

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

Date

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/ 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
Engineering			
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]			
Administrative			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
[add any additional controls your workplace is using]			
[add any additional controls your workplace is using]			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
[add any additional controls your workplace is using]			

Appendix C: Investigating COVID-19 Cases

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

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

Date: [enter date]

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

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

Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):

Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:			
All employees who may have had COVID-19 exposure and their authorized representatives.	Date:		
	Names of employees that were notified:		
Independent contractors and other employers present at the workplace during the high-risk exposure period.	Date:		
	Names of individuals that were notified:		
What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?		What could be done to reduce exposure to COVID-19?	
Was local health department notified?		Date:	

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

Appendix D: COVID-19 Training Roster

Date: **[enter date]**

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

Employee Name	Signature

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

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

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

COVID-19 testing

- We will provide COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period. COVID-19 testing will be provided at no cost to employees during employees' working hours.
- COVID-19 testing consists of the following:
 - All employees in our exposed workplace will be immediately tested and then tested again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by, the local health department.
 - After the first two COVID-19 tests, we will continue to provide COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
 - We will provide additional testing when deemed necessary by Cal/OSHA.

Exclusion of COVID-19 cases

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

Investigation of workplace COVID-19 illness

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

COVID-19 investigation, review and hazard correction

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

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
 - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
 - Our COVID-19 testing policies.
 - Insufficient outdoor air.
 - Insufficient air filtration.
 - Lack of physical distancing.
- Updating the review:
 - Every thirty days that the outbreak continues.
 - In response to new information or to new or previously unrecognized COVID-19 hazards.
 - When otherwise necessary.
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and

review. We will consider:

- Moving indoor tasks outdoors or having them performed remotely.
- Increasing outdoor air supply when work is done indoors.
- Improving air filtration.
- Increasing physical distancing as much as possible.
- Respiratory protection.
- [describe other applicable controls].

Notifications to the local health department

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

Additional Consideration #2

Major COVID-19 Outbreaks

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

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

COVID-19 testing

We will provide twice a week COVID-19 testing, or more frequently if recommended by the local health department, to all employees present at our exposed workplace during the relevant 30-day period(s) and who remain at the workplace. COVID-19 testing will be provided at no cost to employees during employees' working hours.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees with COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria**, and any relevant local health department orders.

Investigation of workplace COVID-19 illnesses

We will comply with the requirements of our CPP **Investigating and Responding to COVID-19 Cases**.

COVID-19 hazard correction

In addition to the requirements of our CPP **Correction of COVID-19 Hazards**, we will take the following actions:

- In buildings or structures with mechanical ventilation, we will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, we will use filters with the highest compatible filtering efficiency. We will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems would reduce the risk of transmission and implement their use to the degree feasible.
- We will determine the need for a respiratory protection program or changes to an existing respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- We will evaluate whether to halt some or all operations at our workplace until COVID-19 hazards have been corrected
- Implement any other control measures deemed necessary by Cal/OSHA.

Notifications to the local health department

We will comply with the requirements of our **Multiple COVID-19 Infections** and **COVID-19 Outbreaks-Notifications to the Local Health Department**.

Additional Consideration #3

COVID-19 Prevention in Employer-Provided Housing

[This section will need to be added to your CPP if you have workers in employer-provided housing. Reference section [3205.3](#) for details. Employer-provided housing is any place or area of land, any portion of any housing accommodation, or property upon which a housing accommodation is located, consisting of: living quarters, dwelling, boardinghouse, tent, bunkhouse, maintenance-of-way car, mobile home, manufactured home, recreational vehicle, travel trailer, or other housing accommodations. Employer-provided housing includes a “labor camp” as that term is used in title 8 of the California Code of Regulations or other regulations or codes. The employer-provided housing may be maintained in one or more buildings or one or more sites, including hotels and motels, and the premises upon which they are situated, or the area set aside and provided for parking of mobile homes or camping. Employer-provided housing is housing that is arranged for or provided by an employer, other person, or entity to workers, and in some cases to workers and persons in their households, in connection with the worker’s employment, whether or not rent or fees are paid or collected.

- This section does not apply to housing provided for the purpose of emergency response, including firefighting, rescue, and evacuation, and support activities directly aiding response such as utilities, communications, and medical operations, if:
 - The employer is a government entity; or
 - The housing is provided temporarily by a private employer and is necessary to conduct the emergency response operations.
- The requirements below for Physical distancing and controls, Face coverings, Cleaning and disinfecting, Screening, and Isolation of COVID-19 cases and persons with COVID-19 exposure do not apply to occupants, such as family members, who maintained a household together prior to residing in employer-provided housing, but only when no other persons outside the household are present.]

Assignment of housing units

We will ensure that shared housing unit assignments are prioritized in the following order:

- Residents who usually maintain a household together outside of work, such as family members, will be housed in the same housing unit without other persons.
- Residents who work in the same crew or work together at the same worksite will be housed in the same housing unit without other persons.
- Employees who do not usually maintain a common household, work crew, or worksite will be housed in the same housing unit only when no other housing alternatives are possible.

Physical distancing and controls

We will ensure:

- The premises are of sufficient size and layout to permit at least six feet of physical distancing between residents in housing units, common areas, and other areas of the premises.
- Beds are spaced at least six feet apart in all directions and positioned to maximize the distance between sleepers’ heads. For beds positioned next to each other, i.e., side by side, the beds will be arranged so that the head of one bed is next to the foot of the next bed. For beds positioned across from each other, i.e., end to end, the beds will be arranged so that the foot of one bed is closest to the foot of the next bed. Bunk beds will not be used.
- Maximization of the quantity and supply of outdoor air and increase filtration efficiency to the highest level compatible with the existing ventilation system in housing units.

Face coverings

We will provide face coverings to all residents and provide information to residents on when they should

be used in accordance with state or local health officer orders or guidance.

Cleaning and disinfection

We will ensure that:

- Housing units, kitchens, bathrooms, and common areas are effectively cleaned and disinfected at least once a day to prevent the spread of COVID-19. Cleaning and disinfecting shall be done in a manner that protects the privacy of residents.
- Unwashed dishes, drinking glasses, cups, eating utensils, and similar items are not shared.

Screening

We will encourage residents to report COVID-19 symptoms to **[enter name of individual, position, or office]**.

COVID-19 testing

We will establish, implement, and maintain effective policies and procedures for COVID-19 testing of occupants who had a COVID-19 exposure, who have COVID-19 symptoms, or as recommended by the local health department.

Isolation of COVID-19 cases and persons with COVID-19 exposure

We will:

- Effectively isolate COVID-19 exposed residents from all other occupants. Effective isolation will include providing COVID-19 exposed residents with a private bathroom, sleeping area, and cooking and eating facility.
- Effectively isolate COVID-19 cases from all occupants who are not COVID-19 cases. Effective isolation will include housing COVID-19 cases only with other COVID-19 cases, and providing COVID-19 case occupants with a sleeping area, bathroom, and cooking and eating facility that is not shared by non-COVID-19-case occupants.
- Keep confidential any personal identifying information regarding COVID-19 cases and persons with COVID-19 symptoms, in accordance with our CPP **Investigating and Responding to COVID-19 Cases**.
- End isolation in accordance with our CPP **Exclusion of COVID-19 Cases and Return to Work Criteria**, and any applicable local or state health officer orders.

Additional Consideration #4

COVID-19 Prevention in Employer-Provided Transportation to and from Work

[This section will need to be added to your CPP if there is employer-provided motor vehicle transportation to and from work, which is any transportation of an employee, during the course and scope of employment, provided, arranged for, or secured by an employer including ride-share vans or shuttle vehicles, car-pools, and private charter buses, regardless of the travel distance or duration involved. Reference section [3205.4](#) for details.]

This section does not apply:

- If the driver and all passengers are from the same household outside of work, such as family members.
- To employer-provided transportation when necessary for emergency response, including firefighting, rescue, and evacuation, and support activities directly aiding response such as utilities, communications and medical operations.]

Assignment of transportation

We will prioritize shared transportation assignments in the following order:

- Employees residing in the same housing unit will be transported in the same vehicle.
- Employees working in the same crew or worksite will be transported in the same vehicle.
- Employees who do not share the same household, work crew or worksite will be transported in the same vehicle only when no other transportation alternatives are possible.

Physical distancing and face coverings

We will ensure that the:

- Physical distancing and face covering requirements of our CPP **Physical Distancing and Face Coverings** are followed for employees waiting for transportation.
- Vehicle operator and any passengers are separated by at least three feet in all directions during the operation of the vehicle, regardless of the vehicle's normal capacity. Vehicle operator and any passengers are provided and wear a face covering in the vehicle as required by our CPP **Face Coverings**.

Screening

We will develop, implement, and maintain effective procedures for screening and excluding drivers and riders with COVID-19 symptoms prior to boarding shared transportation.

Cleaning and disinfecting

We will ensure that:

- All high-contact surfaces (door handles, seatbelt buckles, armrests, etc.) used by passengers are cleaned and disinfected before each trip.
- All high-contact surfaces used by drivers, such as the steering wheel, armrests, seatbelt buckles, door handles and shifter, are cleaned and disinfected between different drivers.
- We provide sanitizing materials, training on how to use them properly, and ensure they are kept in adequate supply.

Ventilation

We will ensure that vehicle windows are kept open, and the ventilation system set to maximize outdoor air and not set to recirculate air. Windows do not have to be kept open if one or more of the following conditions exist:

- The vehicle has functioning air conditioning in use and the outside temperature is greater than 90 degrees Fahrenheit.
- The vehicle has functioning heating in use and the outside temperature is less than 60 degrees Fahrenheit.
- Protection is needed from weather conditions, such as rain or snow.
- The vehicle has a cabin air filter in use and the U.S. EPA Air Quality Index for any pollutant is greater than 100.

Hand hygiene

We will provide hand sanitizer in each vehicle and ensure that all drivers and riders sanitize their hands before entering and exiting the vehicle. Hand sanitizers with methyl alcohol are prohibited.