



**St. John Eudes School**

Chatsworth, CA

**COVID-19  
PREVENTION PROGRAM  
(CPP)**



# **COVID-19 Prevention Program (CPP) for St. John Eudes School in Chatsworth, CA**

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

**Date: February 1, 2021**

## **Authority and Responsibility**

Mrs. Lizette Strom, Principal 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.
- All Faculty, Staff, Student, and Visitor's are given a health screening and have temperatures checked daily.
- As a precautionary measure, teachers and staff will be COVID-19 tested on a rotational basis within a two-month period.
- Safety Committee, made up administration, teachers, parents, and health professionals, has been established to assist in identifying COVID-19 hazards and provide recommendations as needed.
- St. John Eudes School will continue to actively monitor developments in our school community as well as ensure that the school keeps up to date with information from state and local health authorities.

## **Employee participation**

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by notifying the administration and/or Safety Committee of any concerns.

## **Employee screening**

We screen our employees in accordance with CDPH self-screening guidelines. Every morning, administration sends out a health screening questionnaire via Google Form to all faculty and staff. This form must be completed before entering school.

The following questions are asked daily:

1. Since the last time you were in school, did you have a fever of 100.4°F or more; feeling feverish (chills, sweating); NEW cough (different from baseline); shortness of breath; muscle/body aches; diarrhea/vomiting; or NEW loss of taste or smell?
2. Have you had any close contact or been in the classroom with someone with a confirmed case of COVID-19? "A contact of a child or employee with laboratory-confirmed COVID-19 infection is defined as a child or employee at the facility that was within 6 feet of an individual with laboratory confirmed COVID-19 infection for greater than 15 cumulative minutes in a 24-hour period; had unprotected direct contact with bodily fluids/secretions from a person with laboratory-confirmed COVID-19 infection; or is a member of a classroom or cohort with exposure to a person with laboratory confirmed infection.
3. If you answered YES, what is the date of the last exposure to confirm 10 days quarantine? If you answered no, please indicate N/A.
4. Please check your temperature if you are going to work on campus and type it in the line provided below. If you are going to work from home, please indicate N/A.

If an employee presents with signs or symptoms of COVID-19, they are asked to stay home. Any employee with a temperature of 99.5 or above will be requested to stay home.

## 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:

- The Administration and/or Safety Committee will be consistently monitoring the school premises to ensure safety at all times.
- The Administration and/or Safety Committee will address hazards or concerns when reported.
- The severity of the hazard or concern will be assessed and corrections will be made as soon as feasibly possible.

## 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:

- Teacher and staff work spaces are at least 6 feet from other work spaces.
- Outside every classroom, there are 6 foot markers/blue tape on the ground as visual reminders to everyone to maintain 6 feet of physical distance.
- Signage with safety reminders is posted around the school campus.
- The School Office is restricted to one visitor at a time.
- The faculty work space is restricted to no more than five people at any given time. Three people may eat at the 12 foot table at one time.
- Recess and lunch breaks are staggered.
- Staff meetings may continue to be held virtually when possible, if not, they will be held in the large hall in order to maintain at least 6 feet of physical distancing.
- Homeroom teachers and their aides will remain in their classrooms.
- Teachers and staff will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

### Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department. St. John Eudes School has purchased Personal Protective

Equipment (PPE) and also received PPE from the State of California for faculty and staff. Disposable and cloth face masks are available in the Health Office, as needed. Faculty and staff have received two (2) 3-ply face masks with the school logo that contains an antibacterial filter layer for more protection. Teachers and staff attending in-person instruction are encouraged to have extra face masks with them. Any vendors or visitors who come to the office or school campus will not be permitted without a face covering. A face mask will be offered to them for use while on campus.

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. In this instance, a face shield with a drape must be worn instead.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart. This would only be in the case when a teacher must demonstrate daily oral language, as needed.

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: a plexiglass barrier in the School Office between visitors and office staff, a plexi desk barrier for the Business Office between the visitor and Business Manager or a chair placed at the door to minimize exposure, and plexi desk barriers are available for teachers and students to use to provide extra protection when square footage does not allow for a minimum of 6 feet of physical distancing.

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

- When there is extreme weather conditions, all classrooms and office spaces have air purifiers within the HVAC system that utilizes Needle Point Bi-polar Ionization (NPBI) technology to assist in deactivating up to 99.4% of the pathogens in the breathing zone.
- If the HVAC unit is not in use, doors and/or windows will be opened for ventilation.
- All classrooms and office spaces have portable air purifiers to use in conjunction with the open doors and/or windows.
- The HVAC units have filters that have been installed with the filtration efficiency to the highest level compatible with the existing ventilation system.
- The HVAC units are maintained regularly by a third party professional vendor.

### **Cleaning and disinfecting**

We implement the following cleaning and disinfection measures for frequently touched surfaces: St. John Eudes School teachers and staff will clean and disinfect frequently used high touch areas after student use. In addition, the school has outsourced a custodial company that comes daily in the evenings to disinfect all classrooms and office spaces.

- All classrooms have hands free sensed hand sanitizers.
- While doors are closed HVAC iWave air circulation
- Every classroom is equipped with portable air purifiers
- Vendor checked and regularly maintained air filters are of the highest efficiency
- Drinking fountain closed - Water bottles encouraged
  - Only the refilling water bottle station is permitted.

- In the event a student does not have a water bottle, the school will provide one to the student.
- Steps will be taken to ensure that all water systems are safe to use after prolonged non-use.
- Regular cleaning between student and staff use, as needed.
- Using EPA approved cleaning agents, including janitorial/custodial.
- PPE provided to students, faculty, staff, and visitors, as needed.
- Proper storage of cleaning agents.
- Thorough nightly disinfecting.
- Hand sanitizer, disinfecting wipes, and cleaning supplies are available in every classroom and office.
- Sharing of equipment and supplies is avoided where possible. Should equipment need to be shared, it must be sanitized before and after each use.

Please refer to the table found below for further information regarding frequency:

CATEGORY	FREQUENCY
Restrooms	High touch points cleaned after each use and thorough cleaning at the end of each day
High Touch Surfaces (i.e., door handles, faucets, light switches, water filling stations)	After individual use and nightly, 5x a week
Common Areas: (i.e., offices, classrooms, halls, lunch area)	After individual use and nightly, 5x a week
Office Reception Area (i.e., lobbies, entry areas, countertops, pens, payment drop box)	After individual use and nightly, 5x a week
Workspaces (teachers' desks, office desks, student desks)	After individual use and nightly, 5x a week
Electronic Equipment (i.e. Copier)	After individual use and nightly, 5x a week
Teacher/Staff break room and appliances (i.e., refrigerator/microwave handles)	After individual use and nightly, 5x a week
Water Bottle Filling Station	High touch points cleaned after each use and thorough cleaning at the end of each day
Cafeteria food preparation area (If ChoiceLunch resumes business, food is prepared by this outside vendor.)	N/A

Should we have a COVID-19 case in our workplace, we will implement the following procedures: The classroom or office space will be closed until the custodial staff is able to properly disinfect the entire area. The custodial staff is a licensed, bonded, and insured outside vendor that keeps up with the latest information on ways to combat COVID-19 and has trained their employees to use EPA approved surface disinfectant sprays to sanitize. Once sanitized and disinfected, the space will be ready and safe to use by the next school day.

### **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 employees.

Disinfectant wipes and sprays are available by high touch point areas in the school office, faculty work

space, and classrooms. Hands free antibacterial soap and hand sanitizer is also available to use after cleaning surfaces and equipment.

### **Hand sanitizing**

In order to implement effective hand sanitizing procedures, we:

- Expect teachers and staff to use hand sanitizer every time they enter and exit the classroom.
- Expect teachers and staff to assist in wiping down their own desk by using disinfectant wipes or sprays.
- Expect teachers and staff to wash their hands, rubbing thoroughly, for at least 20 seconds with the antibacterial soap and dry their hands thoroughly with the single-use paper towels provided in the bathrooms after recess, lunch, and after restroom use.
- Upgrade all restrooms to include hands-free antibacterial soap dispensers and hands-free paper towel dispensers for all to use.
- Upgrade all classrooms to include hands-free hand sanitizer that does not contain methanol or methyl alcohol.
- Placed signage with safety reminders in many places around the school campus.

### **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.

## **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 sent home with instructions to get tested for COVID-19 on the 5th day, at the earliest, from exposure. If the employee tests negative and has no symptoms, they may return to work after the 7th day from possible exposure and must continue to watch for symptoms through day 10. Testing can be accessed at no additional cost through the county and locations will be provided to the employee, but if an employee would prefer to go through their own insurance for testing, they may do so. If an employee chooses not to get tested, they may get clearance from a medical doctor to return to work, but if they choose not to seek medical advice, the employee must self-quarantine for 10 full days before returning to work, as long as they continue to be symptom free. Employees must report health status to the administration at all times.

## **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 directly to the Administration immediately and also by completing the daily self-screening Google form questionnaire for documentation purposes.
- Employees can report symptoms and hazards without fear of reprisal.
- Procedures or policies are in place for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- For precautionary purposes, teachers and staff have been notified via email when to get COVID-19 tested. Dates are on a rotational basis within a two-month period for all employees and locations for free testing is provided.

- The Return to In-Person Instruction Handbook provides guidelines on testing and what to do when there is a positive test. It also provides policies, procedures, and information on what is being done to mitigate the spread of the virus.
- Any positive cases will be reported following local and state guidelines and protocols, as well as to the COVID Response Team for the Archdiocese of Los Angeles.

## 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.
- The Administration regularly updates the faculty and staff via email, faculty meetings, Zoom Meetings, in-person meetings on campus, text, etc. on the latest guidelines and requirements.

**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, payments from public sources or other means of maintaining earnings, rights and benefits, where permitted by law and when not covered by workers' compensation.
- Providing employees at the time of exclusion with information on available benefits.

## 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 the Archdiocese of Los Angeles, 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 99.5 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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Date: February 1, 2021

## 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:** Administration and/or Safety Committee

**Date:** February 1, 2021

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

Lizette Strom and Sheryl Reyes

Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards	Places and times	Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers	Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation
Classrooms, office, faculty lounge/work room, lunch area, restrooms, hall, labs, library, assembly areas, walkway, etc.	During school hours from 7:30am - 4:30pm	None	All safety procedures and protocols are in place and being followed.

## Appendix B: COVID-19 Inspections

[www.dir.ca.gov/dosh/coronavirus/](http://www.dir.ca.gov/dosh/coronavirus/)

Date: February 1, 2021

Name of person conducting the inspection: Lizette Strom and Sheryl Reyes

Work location evaluated: St. John Eudes School, Chatsworth CA

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Barriers/partitions	✓	Faculty & Staff	
Ventilation (amount of fresh air and filtration maximized)	✓	Faculty & Staff	
Additional room air filtration	✓	Faculty & Staff	
HVAC Units with iWave filters maintained	✓	Administration	
<b>Administrative</b>			
Physical distancing	✓	Faculty & Staff	
Surface cleaning and disinfection (frequently enough and adequate supplies)	✓	Faculty & Staff and Custodian	
Hand washing facilities (adequate numbers and supplies)	✓	Custodian	
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions	✓	Administration and Custodian	
<b>PPE</b> (not shared, available and being worn)	✓	Administration, Faculty & Staff, and Health Room Coordinator	
Face coverings (cleaned sufficiently often)	✓	Administration	
Gloves	✓	Administration and Health Room Coordinator	
Face shields	✓	Administration and Health Room Coordinator	
6ft markers/blue tape on ground	✓	Administration and Athletic Director	
Signage of safety reminders	✓	Administration and Office Staff	

## 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)]

<b>Employee (or non-employee*) name:</b>		<b>Occupation (if non-employee, why they were in the workplace):</b>	
<b>Location where employee worked (or non-employee was present in the workplace):</b>		<b>Date investigation was initiated:</b>	
<b>Was COVID-19 test offered?</b>		<b>Name(s) of staff involved in the investigation:</b>	
<b>Date and time the COVID-19 case was last present in the workplace:</b>		<b>Date of the positive or negative test and/or diagnosis:</b>	
<b>Date the case first had one or more COVID-19 symptoms:</b>		<b>Information received regarding COVID-19 test results and onset of symptoms (attach documentation):</b>	
<b>Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):</b>			

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

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

## Appendix D: COVID-19 Training Roster

**Date:** Ongoing

**Person that conducted the training:** Lizette Strom

Employee Name	Position
Sylvia Valdez	Kindergarten Teacher
Noelle Gallucci	Kindergarten Aide
Esthela Gonzales	1st Grade Teacher
Frances Funicello	1st Grade Aide
Beatriz Moreno	2nd Grade Teacher
Traci Banks	2nd Grade Aide
Leslie Rigney	3rd Grade Teacher
Sr. Divaelia Moreno	3rd Grade Aide
Aileen Vasquez	4th Grade Teacher
Paige Wilton	5th Grade Teacher
Nicole Niemiec	Middle School Teacher
Allison Martin	Middle School Teacher
Amanda El Khoury	Middle School Teacher
Ryan Spencer	PE Teacher and Athletic Director
Dana Howell	Music Teacher
Evelyn Cortez	Gr. 3-8 Spanish Teacher and Gr. 5-8 Religion Teacher
Sr. Daisy Gomez	Gr. TK-2 Spanish Teacher
Merly Uyanga	Aide and Yard Supervisor
Genalie Watrin	Aide and Yard Supervisor
Sr. Emma Roman	Aide and Yard Supervisor
Ana Tenorio	Aide and Yard Supervisor
Tess Yuhico	Health Room Coordinator
Esperanza Martin	Administrative Assistant
Jie Prospero	Executive Assistant
Terese Crow	Business Manager
Sheryl Reyes	Vice Principal, Computers K-5

## 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**.