

COVID-19 Prevention Program (CPP) for Silicon Valley Academy

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

Date: 3/1/2021

Authority and Responsibility

Mona Nezzar 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.

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by communicating potential COVID-19 hazards to Mona Nezzar, Principal, and/or Lina Arab, Vice Principal, in-person, by email, or phone.

Employee screening

We screen our employees and students by conducting a daily COVID-19 symptom screening for all personnel and Program participants upon arrival and admission into the facility. If an affirmative answer is given to any of the questions below, SVA will not permit said person (student, guardian, caregiver, personnel, visitor, etc.) from entering the facility.

1. Are you a confirmed COVID-19 case?
2. Have you had any of the following COVID-19 symptoms within the last 24 hours?
 - a. fever of 100.0 degrees Fahrenheit or more (SVA will take a temperature check as well using a non-touch thermometer), chills, cough, shortness of breath, difficulty breathing, fatigue, muscle or body aches, headache, confusion, recent loss of taste or smell, sore throat, nausea, vomiting, or diarrhea.
3. Have you been in contact with someone who tested positive for or been diagnosed as having COVID-19 or any other communicable disease?
4. Have you traveled outside the county within the past 10 days?

SVA personnel will also conduct a visual wellness check upon arrival and will continue to monitor throughout the day for any changes.

SVA has identified an isolation room as well as an outdoor area to separate anyone who exhibits COVID-19 symptoms.

Any student or personnel exhibiting symptoms will immediately be required to wear a face covering (if not wearing one already) and wait in the isolation room/area until they can be transported home or to a healthcare facility, as soon as practicable. For serious illness, 9-1-1 will be called without delay.

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:

Mona Nezzar, Principal, and Lina Arab, Vice Principal, will identify the hazard and together determine the severity of the hazard and determine correction of the hazard. Based on the hazard, an employee or an outside contractor will correct the hazard within three days or as soon as 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:

- Having all personnel shall maintain at least a six-foot distance from all other personnel and any visitors.
- Holding meetings/trainings for personnel remotely if feasible. If meetings/training for personnel must occur in-person, SVA will hold meetings/trainings outdoors, if feasible, and ensure all personnel are at least six feet apart at all times.
- Not allowing personnel to eat together in any indoor spaces, such as break rooms and offices. When possible, personnel will be strongly encouraged to take their meals outdoors, or if not, to eat alone at their own workspaces.
- Distancing teacher and staff desks at least six feet away from students' desks to minimize the risk of adult-to-child disease transmission.
- Assigning stable seating arrangements for students to ensure that close contacts within classrooms are minimized and easily identifiable.
- Moving as much instruction and as many activities as possible to outdoor spaces and other larger spaces to allow for greater distancing between students and greater dispersion of viral particles.
- Training staff and students to maintain at least six feet of distance from each other as much as possible.
- Reducing the amount of furniture and equipment in the classroom to facilitate distancing and reduce high-touch surfaces.
- Facing student desks in the same direction (and not facing each other) to minimize risk of disease transmission, if feasible.
- Keeping students' belongings separate so that students do not come in contact with other students' belongings.
- Placing markings on classroom floors, in hallways, and outdoors to facilitate physical distancing.
- Placing PreK nap time cots 6 feet apart, with heads in opposite directions.
- Staggering restroom use by groups of students to the extent practicable.
- Holding outdoor activities in separated areas designated by class and/or staggered throughout the day.
- Placing markings on the playground to facilitate physical distance between stable groups.
- Instructing playground supervisors to keep stable groups apart to the extent practicable.
- Not allowing the use of lockers by students to avoid unnecessary mixing of students in hallways.
- Minimizing congregate movement through hallways as much as practicable by staggering passing times when necessary or when students cannot stay in one room and establish designated one-way walking/passage areas.

Individuals 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.

SVA has posted signage in high visibility areas to remind students and staff of (1) when and where face coverings are required and (2) appropriate use of face coverings.

SVA will communicate with all staff and families regarding expectations for use of face coverings at school and how to wash face coverings.

SVA will educate students, particularly younger students, on the rationale and proper use of face coverings.

A face covering must be worn at all times while on SVA campus, unless mentioned under Exemptions below. SVA will provide a face covering to anyone who does not have one.

All personnel shall wear a face covering at all times while at work. If any personnel are unable to wear a face covering for medical reasons, they will not be allowed to have direct contact with students.

Personnel may consider using face coverings with clear windows or a face shield with an appropriate seal (cloth covering extending from the bottom edge of the shield and tucked into the shirt collar) during phonological instruction to enable students to see the staff member's mouth and in settings where a face covering poses a barrier to communicating with a student who is hearing impaired or a student with a disability.

All students ages 2 and up must wear face coverings at all times.

All adults picking up or dropping off students must wear face coverings.

Anyone over the age of 2 must wear a face covering at all times.

All visitors must wear face coverings at all times.

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

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
- Employees wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

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

Engineering controls

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

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

- increasing ventilation by increasing outdoor air circulation (e.g., by opening any operable windows and/or doors), unless doing so would pose a health or safety risk to individuals using the facility (e.g., allowing in pollen or smoke or exacerbating asthma symptoms).
- having the HVAC system maintained and adjusted by Santa Clara Unified School District with MERV filters put in place.

Cleaning and disinfecting

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

- Ensuring adequate supplies and adequate time for it to be done properly.

- Informing the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection.
- At least daily, and more frequently if feasible, cleaning and disinfecting frequently touched hard surfaces, such as tables, desks, chairs, door handles, light switches, phones, copy/fax machines, bathroom surfaces (toilets, countertops, faucets), drinking fountains, as well as shared objects (toys, games, art supplies, books) pursuant to CDC guidance.
- Using cleaning products approved for use against COVID-19 on the Environmental Protection Agency (EPA)-approved list “N” and follow product instructions. All cleaning products will be kept out of children’s reach.
- Teaching and reinforcing proper handwashing technique to our students; avoiding contact with one’s eyes, nose, and mouth; and covering coughs and sneezes.
- Making available adequate supplies to support healthy hygiene behaviors, including soap, tissues, no-touch trashcans, face coverings, and hand sanitizer (with at least 60 percent ethyl alcohol) for personnel and students.
- Ensuring students wash their hands or use hand sanitizer upon arrival, after using the restroom, after playing outside, before and after eating, and after coughing or sneezing. These routines will be conducted with appropriate distancing between students.
- Modeling and practicing handwashing before and after eating, after coughing or sneezing, after playing outside, and after using the restroom for our students.
- Serving food individually plated or bagged. SVA will not allow sharing of food and utensils and buffet or family-style meals.

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

- Close off areas used by the person who is sick.
- Open outside doors and windows and use fans or other engineering controls to increase air circulation in the area. Wait 24 hours before you clean or disinfect. If 24 hours is not feasible, wait as long as possible.
- Clean and disinfect the immediate workspace used by the person who is sick or diagnosed with COVID-19, such as the surfaces in their office or cubicle. If common areas such as bathrooms or shared items have already been routinely cleaned and disinfected, there is no need for additional action.
- Vacuum the space if needed. Use a vacuum equipped with high-efficiency particulate air (HEPA) filter and bags, if available. Wait until the room or space is empty to vacuum, such as at night, for common spaces, or during the day for private rooms.
- Wear disposable gloves to clean and disinfect.
- For soft (porous) surfaces such as carpeted floors or rugs, clean the surface with detergents or cleaners appropriate for use on these surfaces, according to the textile’s label. After cleaning, disinfect with an appropriate disinfectant on EPA List N: Disinfectants for Coronavirus (COVID-19) external icon. Soft and porous materials, like carpet, are generally not as easy to disinfect as hard and non-porous surfaces. Follow the disinfectant manufacturer’s safety instructions (such as wearing gloves and ensuring adequate ventilation), for concentration level, application method and contact time. Allow sufficient drying time if vacuum is not intended for wet surfaces.
- While vacuuming, temporarily turn off in-room, window-mounted, or on-wall recirculation HVAC to avoid contamination of the HVAC units.
- Once area has been appropriately disinfected, it can be opened for use.

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

- Minimizing sharing of materials to the extent feasible, and any toys/materials used by multiple students will be cleaned between uses.
- Limiting use of supplies and equipment to one group of students at a time and clean and disinfect between uses pursuant to CDC guidance.

- Labeling all personal items and keeping them in the student's designated cubby/bin to ensure personal items are separate from others.
- Sending home personal toys and blankets with the family each day to be washed.
- Serving snack food individually plated or bagged.
- Cleaning daily before student use nap time cots.
- Minimizing staff and students' contact with high-touch surfaces (e.g., propping open doors) to the extent feasible.
- At least daily, and more frequently if feasible, cleaning and disinfecting frequently touched hard surfaces, such as tables, desks, chairs, door handles, light switches, phones, copy/fax machines, bathroom surfaces (toilets, countertops, faucets), drinking fountains, as well as shared objects (toys, games, art supplies, books) pursuant to CDC guidance.
- SVA staff will be using cleaning products approved for use against COVID-19 on the Environmental Protection Agency (EPA)-approved list "N" and follow product instructions. All cleaning products will be kept out of children's reach.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- have posted signage in high visibility areas to remind students and staff of proper techniques for handwashing and covering of coughs and sneezes and other prevention measures.
- will teach and reinforce proper handwashing technique; avoiding contact with one's eyes, nose, and mouth; and covering coughs and sneezes.
- will make available adequate supplies to support healthy hygiene behaviors, including soap, tissues, no-touch trashcans, face coverings, and hand sanitizer (with at least 60 percent ethyl alcohol) for personnel and students.
- will ensure students wash their hands or use hand sanitizer upon arrival, after using the restroom, after playing outside, before and after eating, and after coughing or sneezing. These routines will be conducted with appropriate distancing between students.
- will provide hand sanitizer, face coverings, and gloves for students and staff during outdoor recess and activities.

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:

Close Contact:

- All students or personnel who had close contact with a COVID-19 positive person OR who are members of a stable cohort with the COVID-19 positive person will be sent home and instructed to quarantine at home for at least 10 days after their last exposure to the positive case and should continue monitoring for symptoms for a full 14 days.
- For confirmed COVID-19 cases who are unable to isolate from other household members, household close contacts must isolate until 10 days after the case completes their isolation period. This may be 20 days or more.
- A close contact who has or who develops symptoms should be tested immediately.

- A close contact without symptoms should get tested around day 6 of their quarantine period.
- If testing is done earlier than 6 days after the last exposure to the COVID positive person, then they should get tested again towards the end of the 10-day quarantine period.
- If the close contact tests positive prior to the completion of their quarantine period, they must follow the requirements for positive cases.
- Close contacts without symptoms may end quarantine after day 10 from last exposure but should continue monitoring for symptoms for a full 14 days.
- Close contacts who develop symptoms before day 10, but who test negative must remain in quarantine for at least 10 days AND until 24 hours after fever resolution and improvement in other symptoms, whichever is longer.
- Close contacts who develop symptoms between days 11 – 14 but who test negative must remain in quarantine until 24 hours after fever resolution and improvement in other symptoms.

Positive Case:

- SVA requires students and personnel to immediately report to SVA administration if a student or personnel tests positive for COVID-19 or if one of their household members or non-household close contacts test positive for COVID-19.
- Any SVA student or personnel who learns they have tested positive for COVID-19 while at SVA will be required to immediately go home or wait in an isolation room/area until they can be transported home or to a healthcare facility, as soon as practicable.
- SVA COVID-19 Designee will notify the County of Santa Clara Public Health Department within 4 hours of learning of any positive COVID-19 case via the Education Case and Contact Reporting Portal.
- Areas used by any COVID-19 positive person during their infectious period will be immediately closed off and disinfected. The infectious period is defined as 48 hours prior to onset of symptoms until 10 days after symptom onset, or if asymptomatic, from 48 hours before the date on which the positive test was collected until 10 days after.
- SVA administrators will notify affected families and personnel of any positive COVID-19 case at SVA while maintaining confidentiality as required by state and federal laws.
- SVA will identify and notify all close contacts to a confirmed COVID-19 case within the Program.
- All students or personnel who had close contact with a COVID-19 positive person OR who are members of a stable cohort with the COVID-19 positive person will be sent home and instructed to quarantine at home for at least 10 days after their last exposure to the positive case and should continue monitoring for symptoms for a full 14 days.
- Symptomatic individuals who test positive for COVID-19 may return if it has been at least 10 days since their symptom onset AND at least 24 hours have passed since their last fever without the use of fever-reducing medications AND their other symptoms have improved.
- Asymptomatic individuals who test positive for COVID-19 may return 10 days after their positive test result was collected.
- Individuals who test positive for COVID-19 and have completed their isolation, as set forth above, shall not be required to provide a medical note or a negative test prior to returning to SVA.
- No actions need to be taken for persons who have not had close contact with a confirmed COVID-19 case, and instead have had close contact with a person who was in close contact with a confirmed COVID-19 case.

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 Mona Nezzar and/or Lina Arab.
- 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.
- To give employees the tools to get tested when they have symptoms to reduce the likelihood of bringing the virus to work, employees may access COVID-19 voluntary testing available through health plans or local testing centers.
- 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 providing employees at the time of exclusion with information on available benefits.

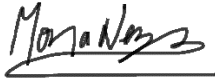
Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and 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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Mona Nezzar, Principal

3/2/2021

Appendix B: COVID-19 Inspections

Date:

Name of person conducting the inspection:

Work location evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
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			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			

Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 testing or related medical services provided by us will be provided in a manner that ensures the confidentiality of employees, 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:

Name of person conducting the investigation:

COVID-19 Case Investigation Information

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:

Person that conducted the training:

Employee Name	Signature

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

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

COVID-19 testing

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

Exclusion of COVID-19 cases

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

Investigation of workplace COVID-19 illness

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

COVID-19 investigation, review and hazard correction

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

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
 - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
 - Our COVID-19 testing policies.
 - Insufficient outdoor air.
 - Insufficient air filtration.
 - Lack of physical distancing.
- Updating the review:
 - Every thirty days that the outbreak continues.
 - In response to new information or to new or previously unrecognized COVID-19 hazards.
 - When otherwise necessary.
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We will consider:
 - Moving indoor tasks outdoors or having them performed remotely.
 - Increasing outdoor air supply when work is done indoors.

- Improving air filtration.
- Increasing physical distancing as much as possible.
- Respiratory protection.
- [describe other applicable controls].

Notifications to the local health department

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

Additional Consideration #2

Major COVID-19 Outbreaks

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

COVID-19 testing

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

Exclusion of COVID-19 cases

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

Investigation of workplace COVID-19 illnesses

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

COVID-19 hazard correction

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

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

Notifications to the local health department

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