

# COVID-19 Prevention Program (CPP) for Natomas Pacific Pathways Prep (NP<sup>3</sup>)

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

**Date: 2/10/2021**

## Authority and Responsibility

**Tom Rutten** 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.

NP<sup>3</sup> will implement the COVID-19 Safety Plan and will correct any unsafe hazard in a timely manner based on the severity of the hazard. Areas to consider, and if necessary, adjust to include:

- Follow all procedures in the event of an exposure of a positive case at any NP<sup>3</sup> campus;
- Follow all screening procedures including passive screen, active screen and visual screen;
- Maintain current knowledge of state and local guidance and hazard prevention. Provide ongoing professional development to keep staff current;
- Site specific evaluation of potential high COVID-19 transmission areas have been identified with PBK Architect and staff have been notified of requirements for cleaning and disinfecting as well as social distancing and other safety procedures within these high intensity areas. High intensity areas can include spaces such as staff rooms, workrooms and restrooms;
- Regularly review the process in place to immediately address COVID-19 cases, as well as workplace compliance with health standards;
- Analyze and adjust, if needed, the procedures for disinfection in the case of an outbreak or major outbreak;
- Ensure all staff and students have access to the appropriate PPE;
- Ensure staff and students are trained, and receive on-going training as needed, to stay current on COVID-19, policies, procedures and county and state guidance;
- Provide, free of charge, COVID-19 testing, both PCR and Rapid Testing, in the event of exposure, positive case, or an outbreak or major outbreak;
- When able, offer vaccinations to all staff and students who are eligible;

- Maintain all signage, posters, directional markers, etc. necessary for visual reminders of expectations for all members of the school community while on a Natomas Campus;
- Maintain high degree of transparency and communication protocols with the community, including staff and student exposure, an outbreak or a major outbreak. Update the Dashboard and provide communications within 24 hours

NP3 uses Minimum Efficiency Reporting Value (MERV) 13 filters as part of the ventilation system at each school site and building. In addition, portable High Efficiency Particulate Air (HEPA) filtration units are in all office areas and classrooms to reduce the risk of transmission. In addition to the requirements of subsection 3205(c)(4), NP3 has taken the following actions:

1. When there is a workplace or school site COVID-19 emergency, NP3 will work with the NUSD and the COVID-19 Response Team and Sacramento County Public Health to determine whether to stop some or all operations at the site until the COVID-19 emergency (hazard) has been corrected.
2. The Health Department will be notified of any corrections.
3. All Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by notifying NP3 administration of any and all possible hazards.

## Employee and Student screening

We screen our employees by:

### Passive screening

- Students and staff will self-screen at home prior to getting on a school bus or coming to school. If the following apply, do not come to school:
  - Temperature (at or above 100.4 degrees), cough, shortness of breath, chills, repeated shaking with chills, headache, sore throat, new loss of taste or smell, fatigue, muscle or body aches, nausea or vomiting, diarrhea
- Report symptoms to your supervisor and the COVID-19 Response Team

### Active Screening

- Non-touch temperature will be taken of all staff upon campus entry.
- Non-touch temperature will be taken prior to getting on a bus or at school if family does not have a thermometer
- Non-touch temperature scanner for students and all outside service providers to use at school if individual did not screen at home
- Staff will ask if the individual being screened has experienced any of the COVID-19 symptoms
- At any time during the day, staff may conduct a visual screening and determine whether an Active Screen shall occur
- If staff/student has a temperature of 100.4 or higher or is exhibiting COVID-19 symptoms, **Protocol for Symptomatic Individual at School** will be implemented

### Visual Screening

- Staff/student/visitor does not look healthy (eg: pallor, chills, sweating, excessive coughing/nose blowing, etc.) or is complaining of not feeling well, staff/student/visitor will report to the Health Room for an Active Screen
- If staff/student has a temperature of 100.4 or higher or is exhibiting COVID-19 symptoms, **Protocol for Symptomatic Individual at School** will be implemented
- California State Preschool Program (CSPP): All students enrolled in the CSPP will be required to have their temperature taken upon arrival. A student who has a fever of 100.4 or higher will not be permitted to class. Additionally, all individuals, prior to entering class, will be required to answer questions as to whether anyone in their home has had COVID-19 symptoms or a positive test within the last 24 hours. Anyone answering in the affirmative to these questions will not be allowed entry.

## 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:

NP<sup>3</sup> will work in with NUSD to assess the severity of the hazard and correct the issue in a timely manner accordingly. NP<sup>3</sup> Administration and NUSD Maintenance and Operations will be responsible for the timely correction and to ensure proper follow-up measures are taken to ensure timely corrections.

## 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:

Physical distancing, also called social distancing, means keeping a safe space between yourself and other people who are not from your small stable group. To practice social or physical distancing, stay at least 6 feet (about 2 arm lengths) from other people who are not from your group in both indoor and outdoor spaces.

Posters to remind staff, students and visitors about the physical distancing requirements are posted in classrooms, hallways and offices throughout the District.

### Classroom Space

- Per CCR, Title 8, Section 3205, all staff/students/visitors shall be separated from other persons by at least six feet, except for momentary exposure while persons are in movement. Methods of physical distancing include:
- Reducing the number of persons in an area at one time;
- Monitor the number of visitors so the maximum number of people on site does not exceed the architect's recommendation posted at each school;
- Visual cues such as signs and floor markings to indicate foot traffic directionality and physical spacing;
- Designated pick up and drop off locations;
- Staggered arrival, departure, work, and break times.
- Evaluating work and school processes and procedures so staff and students maximize social distancing and safety.

When it is not possible to maintain a distance of at least six feet, individuals will be as far apart as possible.

PBK Architects conducted reviews of NP<sup>3</sup> classrooms and sites for compliance with State and Sacramento County Public Health guidance. PBK created a design for each classroom and worked with NP<sup>3</sup> to certify that each room meets the county and state guidelines and requirements. Each space was evaluated for the number of individuals allowed, including furniture, for the number of square feet in the room.

### 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.

Definition: A tightly woven fabric or non-woven material with no visible holes or openings which covers the nose and mouth. ([California Code of Regulations, Title 8, Section 3205](#). COVID-19 prevention.)

- NP<sup>3</sup> shall provide face coverings and ensure they are worn over the nose and the mouth;
- All staff and students and authorized visitors must wear facial coverings, while on campus, both indoors and outdoors, except when eating and drinking;
- Facial coverings are personal and should not be shared;
- Face shields are not a replacement for face coverings, although they may be worn together for additional protection;
- NP<sup>3</sup> has purchased a variety of styles of masks/face coverings to meet the needs of our diverse learners and staff. If a student or staff member requires a non-traditional mask, they need to reach out to their school office or supervisor for assistance.

## Exceptions

The followings are exceptions to face coverings:

- 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;
- Employees/students 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;
- Specific tasks which cannot feasibly be performed with a face covering. This exception is limited to the time period in which such tasks are actually being performed, and the unmasked employee shall be at least six feet away from all other persons unless unmasked employees are tested at least twice weekly for COVID-19.

Staff and students who are exempt from wearing a face covering due to medical conditions, mental health condition, or disability shall wear an effective non-restrictive alternative, such as a face shield with a drape, if their disability permits it.

Per the January 14, 2021, ***COVID-19 and Reopening In-person Instruction Framework & Public Health Guidance for K-12 Schools in California, 2020-2021 School Year***, in order to comply with the facemask guidance, schools must exclude students and staff from campus if they are not exempt from wearing a face covering and refuse to wear one provided by the school.

## Engineering controls

Engineering Controls:

- NP<sup>3</sup> has purchased and installed fixed plexiglass barriers for workstations and office counter space. The plexiglass barriers reduce the risk of aerosol transmission;
- NP<sup>3</sup> has purchased clear plastic desk dividers for use on each student desk;
- As much as possible, NP<sup>3</sup> maximizes the use of outside air (unless there is poor air quality of AQI of 100 or higher for air pollution). In addition, NP<sup>3</sup> has placed HEPA Filters in each classroom and office space and has replaced all HVAC filters with MERV13, hospital grade, air filters.

Administrative Controls:

- NP<sup>3</sup> has cleaning procedures which are outlined in training documents and videos. The procedures have been reviewed and approved by PBK, an outside consultant. The procedures include procedures for cleaning and disinfecting commonly touched surfaces;
- Employees have been trained, and receive continued training, in cleaning and disinfecting protocols. Protocols are included in the [Standard Operating Procedures](#) manual;
- Sharing of tools and equipment is minimized to the maximum extent possible. All maintenance staff have their own disinfecting equipment, including a backpack style sprayer;
- All areas are cleaned, per the protocol provided. PPE is provided to staff, including gloves, face coverings, face shields, goggles and disposable gowns;

- NP<sup>3</sup> encourages the frequent use of hand sanitizer and hand washing. Hand sanitizer stations are located in common areas and individual bottles are located in all classrooms and offices.

Personal Protective Equipment:

- NP<sup>3</sup> frequently evaluates the need for PPE, including, but not limited to, face coverings, gloves, and eye protection. Natomas offers a variety of PPE to accommodate different needs, including a variety of face coverings, respirators, and gowns;
- Respirators and eye protection (goggles, respirators and face shields) are available at each site;
- Sharing PPE is strictly prohibited.

## Cleaning and disinfecting

The District rooms, facilities, all offices and school spaces are cleaned with Ionopure sanitizer, which is FDA approved, non-toxic sanitizer used by other districts, colleges and universities throughout the state and nation. In addition, the entire District is cleaned each evening using a non-toxic Food and Drug Administration (FDA) and Environmental Protection Agency (EPA) approved disinfectant cleaner, ionopure, using disinfectant spray machines. Each District custodian has their own backpack sprayer and backup machines are available as needed.

The following processes are used for cleaning and disinfecting the District:

1. Restrooms: disinfecting and cleaning will take place (DAILY) In addition, restrooms on school sites will be disinfected every two hours while school is in session.
  - a. Door Knobs or handles
  - b. Light switches and cover plates
  - c. Paper towel dispenser knobs or handles
  - d. Faucet handles
  - e. Toilet and urinal flush levers
  - f. Toilet and urinal partitions, doors (including knobs, levers or slides)
  - g. Restock all soap and paper towel dispenser
  - h. Restock all hand sanitizers or replace
2. Cafeteria: cleaning and disinfecting w/kitchen area cleaned & larger cafeteria space cleaned with tables and benches cleaned between use (DAILY)
  - a. Refrigerator door handles
  - b. Microwave door handles and buttons/keypads
  - c. Table tops, Door Knobs or handles
  - d. Light switches and cover plates
  - e. Vending machine buttons
  - f. Drinking fountain covered-not in use
  - g. Student lunch tables and benches seats
  - h. Restock all soap and paper towel dispenser
  - i. Restock all hand sanitizers or replace
3. Locker room: cleaning and disinfecting will take place (DAILY)
  - a. Door Knobs or handles
  - b. Light switches and cover plates
  - c. Lockers
  - d. Partition walls in restrooms
  - e. Drinking fountains covered-not in use
  - f. Sinks are included in the restroom cleaning schedule (every 2 hours)
  - g. Showers are not in use
4. Classroom: cleaning and disinfection of room (DAILY)
  - a. Door Knobs or handles
  - b. Light switches and cover plates
  - c. Desk tops
  - d. Table tops

- e. Countertops and sinks
  - f. Soap dispensers
  - g. Paper Towel dispensers
  - h. White board trays
  - i. Secondary desk tops are cleaned after each use
  - j. In the event of a positive case of COVID-19 in a classroom, the room will be isolated and a second-deep cleaning will occur
5. Procedure for cleaning an Isolation Room or Classroom of symptomatic individual
    - a. Cleaning suits, goggles and/or face shield, gloves and N95 masks available for cleaning the isolation room and a classroom of symptomatic individual(s)
    - b. If possible, ventilate (*open a window*) the room to outside air after student leaves
    - c. If possible, close and secure the room for a minimum of 24 hours or as long as possible prior to deep cleaning and disinfection
  6. Other locations: cleaning and disinfecting (DAILY)
    - a. Elevator call and operating buttons
    - b. Stairway handrails, doorknobs, light switches
    - c. Hallway door knobs, handles, drinking fountain faucets
    - d. Vehicles' steering wheels, door handles, shift knobs, dashboard controls (NIGHTLY)

[Standard Operating Procedures](#) have been developed as a tool to train employees. Employees can refer to the following documents or follow up with their Supervisor for further information or clarification.

### **Play Structure Cleaning and Access**

NP<sup>3</sup> will greatly reduce the number of students on the playground at any given time. Students will be provided outdoor recess in their stable groups. To avoid the possible spread of Covid-19, NP<sup>3</sup> has divided the playgrounds into sections in order to maintain physical distancing requirements.

### **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 NP<sup>3</sup> custodial staff using the proper disinfecting cleaning products.

### **Hand sanitizing**

In order to implement effective hand sanitizing procedures, we will be:

- Evaluating handwashing facilities.
- Determining the need for additional facilities.
- Encouraging and allowing time for employee handwashing.
- Providing employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Encouraging employees to wash their hands for at least 20 seconds each time.]

Personal protective equipment (PPE) used to control employees' exposure to COVID-19

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

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:

- Offered COVID-19 testing at no cost during their working hours.
- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to all employees.

## 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. NP<sup>3</sup> employees should report to their site Principal immediately. In addition, each site has a dedicated staff member who has been trained as a Contact Tracer. It is the employees' responsibility to provide as much detail as possible as to possible exposure.
- That employees can report symptoms and hazards without fear of reprisal.
- NP<sup>3</sup> provides a copy of procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Where testing is not required, how employees can access COVID-19 testing.
- 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 continue to provide effective training and instruction that includes:

- NP<sup>3</sup> 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 10 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 all NP3 employees sick leave benefits and earnings.
- 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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## Appendix B: COVID-19 Inspections

Date:

Name of person conducting the inspection:

Work location evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
<b>Administrative</b>			
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			
<b>PPE (not shared, available and being worn)</b>			
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:**

<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>	

**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>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 s

**Appendix D: COVID-19 Training Roster**

**Date:**

**Person that conducted the training:**

<b>Employee Name</b>	<b>Signature</b>

## **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 will be added to your CPP should the NP3 workplace experience 20 or more COVID-19 cases within a 30-day period.

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**.