



Model COVID-19 Prevention Program (CPP)

With some exceptions, all employers and places of employment are required to establish and implement an effective written COVID-19 Prevention Program (CPP) pursuant to an Emergency Temporary Standard in place for COVID-19 (California Code of Regulations (CCR), Title 8, section 3205(c)). Cal/OSHA has developed this model program to assist employers with creating their own unique CPP tailored to their workplace.

Employers are not required to use this program. Employers may create their own program or use another CCP template. Employers can also create a written CCP by incorporating elements of this program into their existing Injury and Illness Prevention Program (IIPP), if desired. Cal/OSHA encourages employers to engage with employees in the design, implementation and evolution of their COVID-19 Prevention Program.

Using this model alone does not ensure compliance with the emergency temporary standard. To use this model program effectively, the person(s) responsible for implementing the CPP should carefully review:

- All of the elements that may be required in the following CCR, Title 8 sections:
 - 3205. COVID-19 Prevention
 - 3205.1, Multiple COVID-19 Infection and COVID-19 Outbreaks
 - 3205.2, Major COVID-19 Outbreaks
 - 3205.3, Prevention in Employer-Provided Housing
 - 3205.4, COVID-19 Prevention in Employer-Provided Transportation to and from Work
 - The four Additional Considerations provided at the end of this program to see if they are applicable to your workplace.
- The additional guidance materials available at www.dir.ca.gov/dosh/coronavirus/



November 2020

COVID-19 Prevention Program (CPP) for Howell Mountain ESD

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

Date: January 26, 2021

Authority and Responsibility

Dr. Janet Tufts, Superintendent 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.

Terms:

- **“COVID-19 hazard** means exposure to potentially infectious material that may contain SARS-CoV-2, the virus that causes COVID-19. Potentially infectious materials include airborne droplets, small particle aerosols, and airborne droplet nuclei, which most commonly result from a person or persons exhaling, talking or vocalizing, coughing, sneezing, or procedures performed on persons which may aerosolize saliva or respiratory tract fluids, among other things. This also includes objects or surfaces that may be contaminated with SARS-CoV-2.
- **“COVID-19 exposure”** means being within six feet of a COVID-19 case for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the “high-risk exposure period” defined by this section. This definition applies regardless of the use of face coverings.
- **“COVID-19 symptoms”** means the following unless a licensed health care professional determines the person’s symptoms were caused by a known condition other than COVID-19. • fever of 100.4 degrees Fahrenheit or higher • chills • cough • shortness of breath or difficulty breathing • fatigue • muscle or body aches • headache • new loss of taste or smell • sore throat • congestion or runny nose • nausea or vomiting, or diarrhea
- **“COVID-19 test”** means a viral test for SARS-CoV-2 that is:
 - (1) Approved by the United States Food and Drug Administration (FDA) or has an Emergency Use Authorization from the FDA to diagnose current infection with the SARS-CoV-2 virus; and
 - (2) Administered in accordance with the FDA approval or the FDA Emergency Use Authorization as applicable.
- **“Exposed workplace”** means any work location, working area, or common area at work used or accessed by a COVID-19 case during the high-risk period, including bathrooms, walkways, hallways, aisles, break or eating areas, and waiting areas. The exposed workplace does not include buildings or facilities not entered by a COVID-19 case.
- Effective January 1, 2021, the “exposed workplace” also includes but is not limited to the “worksite” of the COVID-19 case as defined by Labor Code section 6409.6(d)(5).

- **“Face covering”** means a tightly woven fabric or non-woven material with no visible holes or openings, which covers the nose and mouth.
- **“High-risk exposure period”** means the following time period:
 - (1) For persons who develop COVID-19 symptoms: from two days before they first develop symptoms until 10 days after symptoms first appeared, and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved; or
 - (2) For persons who test positive who never develop COVID-19 symptoms: from two days before until ten days after the specimen for their first positive test for COVID-19 was collected.

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

HMESD has developed this written COVID-19 Prevention Program, in accordance with TITLE 8, DIVISION 1, CHAPTER 4, Subchapter 7. General Industry Safety Orders Section 3205, COVID-19 Prevention.

The District’s Prevention Program has been developed in accordance with the issued guidance from the State of California Department of Public Health and Cal/OSHA (Appendix A).

COVID-19 Prevention Program An Addendum to the Injury and Illness Program: In accordance with TITLE 8, DIVISION 1, CHAPTER 4, Subchapter 7. General Industry Safety Orders Section 3205, COVID-19 Prevention

- 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.
- Each staff, student and guest participate in a self-health questionnaire and has their temperature taken prior to entering the campus. Ask the employee to confirm that their temperature is less than 100.4 F (38.0 C) and confirm that they are not experiencing coughing or shortness of breath. Administrators are to make a visual inspection of the employee for signs of illness, which could include flushed cheeks or fatigue. Any person who has been exposed to anyone who exhibits any symptoms on the health questionnaire is evaluated for COVID-19. When deemed appropriate, those who exhibit COVID-19 symptoms participate in a 14-day quarantine.
- All staff will be tested as testing capacity permits and as practicable. In addition, any person who has symptoms consistent with Covid-19 or who have tested positive for COVID-19, must not return to the school campus until a medical evaluation and has approval to return to a school setting by a medical provider. All persons on campus shall use a face covering in accordance with CDPH

guidelines.

- All Howell Mountain ESD employees will participate in monthly COVID-19 testing as practicable and as testing permits. Employees will be notified with their results and will email their results to the superintendent, who will maintain a confidential record of all results. Should an employee test positive, they will be informed by receipt of an email. Employees are to report a positive case to the superintendent immediately. Contract tracing will inform which cohorts or additional staff members shall be quarantined for 10 days. All staff and parents will be notified within 24 hours of a positive test result.
- The HMESD school website hosts all COVID-19 policies and procedures that are adopted to protect employees from COVID-19 hazards in the workplace. These documents include: the Howell Mountain Elementary School District Reopening Plan, Napa County Office of Education Considerations for Reopening Schools During the Covid-19 Pandemic, the COVID-19 Safety Plan, Parent Health Screening, and the Covid-19 Prevention Plan.

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: Conducting visual wellness checks of all students and take students' temperature with a no-touch thermometer. Implementing screening and other procedures for all staff and students entering the facility. Asking all individuals if they or anyone in their home is exhibiting COVID -19 symptoms. Employees ensure that their students, colleagues, and self are appropriately wearing face masks each day.

Employee screening

We screen our employees by: Utilizing CDPH guidelines to conduct employee screening. Staff will participate in a self-check health questionnaire; they will also take their temperatures with a no-touch thermometer. Employees are further advised to self-monitor during the workday and contact their supervisor if they develop symptoms. The COVID-19 response team will follow up with the employee right away regarding next steps. Isolation areas have been set up at the site for sick students and /or staff awaiting pick up. A component of the self-check health questionnaire will also be to disclose whether the employee has been in contact for more than 15 minutes and less than six feet of separation without a face mask, with anyone who has tested positive for COVID-19. All employees will be required to always wear face coverings unless they are eating or drinking.

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:

All workspaces will be routinely sanitized. Each doorknob, and handrail will be sanitized throughout the day. All tables and desks will be sanitized throughout the day. Upon use of restroom facilities, sanitation will occur. Each restroom is equipped with hands-free faucets, soap dispenser and paper towel dispensers. Restrooms, cafeterias and staff rooms are inspected for unsafe or unhealthy work conditions. Appropriate signage provides prominent and concise protocols and reminders around the facilities. Furniture has been removed to accommodate physical distancing. Floor markers delineate placement of classroom furniture. One person is allowed in each restroom per use. Play structures will be sanitized between use of different cohorts. All PPE is inventoried on a weekly basis and is replenished as needed. Disinfectant wipes, gloves, hand sanitizer, soap, and paper towels for hand sanitation are widely accessible and stocked daily. Hand sanitizing solution is placed in every classroom, office and shared spaced throughout the facility. Proper ventilation is ensured by the installation of air scrubbers and MERV 13 filters on every HVAC system. All staff is properly trained in

cleaning and disinfecting procedures for individual and workstations to supplement custodial staff efforts.

HMS has developed and implemented a process for screening employees for and responding to employees with COVID-19 symptoms.

HMS has reviewed state and local guidance and orders on hazard prevention, including industry-specific guidance found on Cal/OSHA's website or at Covid19.ca.gov.

HMS frequently reviews existing practices for controlling COVID-19.

HMS Conducts a site-specific evaluation of where COVID-19 transmission could occur, including interactions between employees and any other persons, and places employees may congregate or interact with members of the public.

HMS Allows employees or employees' authorized representatives to participate in hazard identification and evaluation. Authorized representatives have also participated in writing and evaluation of this plan.

HMS Ensures a process is in place to immediately address COVID-19 cases.

HMS Conducts periodic inspections of the workplace to ensure compliance with the ETS and checks for new hazards.

HMS Implements procedures to correct identified hazards.

Control of COVID-19 Hazards

Physical Distancing

Where possible, we ensure at least six feet of physical distancing between all persons at all times in our workplace.

HMEDSD has implemented Illness Prevention Procedures and Protocols. HEMEDSD's Illness Prevention Procedures and Protocols include stable cohorts of staff and students, contact tracing and responsiveness, physical distancing, staff personal protective equipment, face coverings on all persons on campus, scheduled hand washing, temperature checking and hand sanitization procedures. Prominent signage is in all classrooms and common areas. Visitors and volunteers will not have access to the campus.

Students and staff are assigned to stable cohorts, with staggered start and end times. Single cohorts will also have recess and lunch together so that proper sanitation may take place between cohorts. Staff will also have designated break times to minimize contact with each other. Staff meetings will remain virtual when six feet of separation may not be maintained.

Space is maximized between seating and desks. Teachers and other staff desks are at least six feet away from student desks. Student desks are six feet apart and markings on classroom floors promote distancing. Students remain in the same space and in groups as small as practicable. The same students and teacher or staff remain with each group, to the greatest extent practicable. Schedules are staggered as to minimize staff exposure to cohorts. Teachers also remain with one group of students throughout the whole day. Nonessential visitors, volunteers and activities involving other groups at the same time are limited.

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. All staff and students are expected to wear appropriate face coverings daily. Face coverings are provided when face coverings do not meet CDPH health and safety criteria. We ensure that face coverings are worn over the nose and mouth when indoors and when outdoors, and within six feet of another.

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. Employees meeting these criteria may be provided with an alternate work site.
- 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 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: In situations where six feet between individuals is not practicable, a shield or barrier will be used for additional protection. HMS has installed cleanable solid partitions that reduce the risk of aerosol transmission between fixed work locations where it is not possible to physically distance (such as Plexiglas barriers) HMS maximizes the amount of outside air to the extent feasible unless there is poor outside air quality (an AQI of 100 or higher for any pollutant) or some other hazard to employees such as excessive heat or cold. The district has installed air scrubbers on all HVAC systems and has also installed MERV 13 filters on each unit.

We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by opening doors to create a crossflow of fresh air and holding instruction outside when weather permits.

Cleaning and disinfecting

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

- Frequently touched surfaces are cleaned and disinfected using CDC approved sanitation/ disinfectant solution. All employees have been instructed on how to help clean/disinfect frequently touched surfaces such as door and sink handles. Adequate supplies have been distributed to support these efforts, with stock continually monitored and reordered. These items include disinfectant wipes, gloves, hand sanitizer, soap, and paper towels for hand sanitation are widely accessible and stocked daily. Hand sanitizing solution is placed in every classroom, office and shared space throughout buildings. Sanitizing surfaces- All staff identify and schedule frequent disinfection of high-touch surfaces. We wipe down phones between uses. All staff wipe down desks and chairs between student cohorts. Restrooms are sanitized three times a day. All staff follow labeling instructions for cleaning products as well as the Centers for Disease Control (CDC) guidance. All students are issued hand sanitation solution that will be readily available and stored on their desk. Each student will be issued individual school supplies. There will be no sharing of educational materials. We ensure that we have

issued adequate supplies for each student. In addition, staff is provided with and adequate time for it to be done properly.

- The HMS maintenance department keeps a running record to Inform the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection.

Should we have a COVID-19 case in our workplace, we will implement the following procedures: The site that is affected will be thoroughly cleaned and disinfected. The site will remain unoccupied for a minimum of 10 days. All custodial staff have been properly trained in cleaning and disinfecting.

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:

Each student and staff have been issued individual equipment and workspace. After each use of the restroom, the area is sanitized. Hands-free faucets are installed. Staff routinely disinfects common surfaces. Custodians wear proper PPE to sanitize all workstations.

Vehicles are not to be shared.

1. The district will evaluate the need for personal protective equipment to prevent exposure to COVID-19 hazards, such as gloves, goggles, and face shields, and provide such personal protective equipment as needed.
2. The district will evaluate the need for respiratory protection in accordance with section 5144 when the physical distancing requirements in subsection(c)(6) are not feasible or are not maintained.
3. The district will provide and ensure the use of respirators in accordance with section 5144 when deemed necessary by the Division through the Issuance of Order to take Special Action, in accordance with title 8 section 332.3.
4. The district will 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.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

Equip all restrooms with hands-free soap dispensers and faucets. In order to minimize contact, doors to the student restrooms remain open. Upon entering and leaving classrooms, students and staff use hand sanitizing gel. Appropriate, non- methyl alcohol hand sanitizing gel has been issued to each staff and student. Employees and students are instructed and trained on the proper way to wash 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.

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:

Issued Eye protection face shields to protect them from potentially infectious material such as saliva or respiratory tract fluids. All staff and students wear masks.

Offered COVID-19 testing at no cost during work hours.

Offered information on benefits in Training and Instruction and Exclusion of COVID-19 Cases.

HMS will investigate the workplace and will identify all interactions, areas, activities, processes, equipment, and materials that could potentially expose employees to COVID-19 hazards. All persons on site at any time will be treated as potentially infectious.

Hazards in places where people may congregate, meet, come in contact with each other, even when not working will be identified (entrances, hallways, breakrooms, restrooms)

Hazards in areas that might affect the health and safety of others traveling through the workplace and entering or exiting the facility will be identified and evaluated.

Employees will be allowed to participate in the identification and evaluation of COVID-19 hazards.

Indoor ventilation systems have been evaluated and enhanced with air purification and Merv 13 filters.

Notifications to the local health department

1. The district will contact the local health department immediately but no longer than 48 hours after the employer knows, or with diligent inquiry would have known of three or more COVID-19 cases for guidance on preventing further spread of COVID-19 within the workplace.
2. The district will provide 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, hospitalization and/or fatality status, and North American Industry Classification System code of the workplace of COVID-19 case, and any other information requested by the local health department. The district will continue to give notice to the local health department of any subsequent COVID-19 cases in the workplace.

Possible Exposure:

1. The day and time the COVID-19 case was last present and the date of the positive COVID-19 test and/or diagnosis, and the date the COVID-19 case first had one or more COVID-19 symptoms will be determined.
2. Determine who may have had a COVID-19 exposure. HMS will evaluate where the COVID-19 case was within the workplace, the activities of the COVID-19 case and all locations at the workplace which may have been visited during the high-risk exposure period.
3. Give notice of the potential COVID-19 exposure, within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case to all employees who may have had COVID-19 exposure and their authorized representatives. Give notice to independent contractors and other employers present at the workplace during the high-risk exposure.
4. Offer COVID-19 testing at no cost to the employee during their working hours to all employees who have had potential COVID-19 exposure in the workplace and provide them with the information on benefits described in subsections (c) (5)(B) and (c)(10)(C).

5. Investigate whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure to COVID-19 hazards.

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: Employees will report to administration all COVID-19 symptoms as well as possible hazards via a face-to-face meeting, phone call or email.

- 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.
- Where testing is not required, how employees can access COVID-19 testing:
- HMS employees are encouraged to use the Napa County Optum-Serv testing site, which is free of charge. Time is provided during the workday to complete these tests. Tests will be required monthly.
- 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.
- When the testing is in response to CCR Title 8 section 3205.1, Multiple COVID-19 Infections and COVID-19 Outbreaks, as well as section 3205.2, Major COVID-19 Outbreaks, HMS will participate in mandatory testing as available and practicable.
Testing will be provided at no cost to the employee and will take place during work hours.
- 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.
- HMS employees will be encouraged to report COVID-19 symptoms and exposure to the superintendent. There will be no reprisal. HMS has communicated COVID-19 hazards in the workplace and has provided employees with HMS policies and procedures to address them.
- HMS provides any procedures we have for accommodating employees with elevated risk factors for COVID-19, which can be found on the CDC's website. Staff with elevated risk factors are provided the option to work remotely.
- HMS schedules monthly employee COVID-19 testing on site, during the workday.
- If there is a COVID-19 exposure, all staff are provided with a Notice of potential exposure to COVID-19.
- HMS provides all staff with cleaning and disinfection protocols.
- HMS communicates will all staff on how to participate in workplace hazard identification and evaluation per this COVID-19 Prevention Plan.

Investigating and Responding to COVID-19 Cases

- First, HMS determines the day and time the COVID-19 case was last in the workplace, and if possible, the date of testing and onset of symptoms.
- Then, HMS determines which employees may have been exposed to COVID-19.
- Next, HMS notifies employees of any potential exposures within one business day.

- HMS offers testing to any potentially exposed employees at no cost during working hours.
- HMS investigates the exposure, whether workplace conditions could have contributed to the risk of exposure, and what corrections would reduce exposure.
- Employees who have had potential COVID-19 exposure in our workplace will be asked to quarantine for 10 days. HMS will be following the guidelines in the Napa County Office of Education Considerations for Reopening Schools Document.
- In an outbreak (three or more COVID-19 cases in an "exposed workplace" within a 14-day period or identified as an outbreak by a local health department).
- In addition to the requirements for non-outbreak settings, HMS must:
Immediately provide testing to all employees in the exposed workplace and exclude positive cases and exposures from work; repeat the testing one week later; and
Continue testing employees at least weekly until the workplace no longer qualifies as an outbreak.
- HMS has installed air filtration units in all areas.
- HMS will quarantine the exposed cohort for 14 days and will thoroughly clean the area of exposure. When more than 2 outbreaks occur, HMS will revert back to distance only learning and teaching for 14 days.

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.
- HMS policies and procedures to protect employees from COVID-19 hazards:

- HMS shares COVID-19 related benefit information, from HMS or from federal, state or local government, that may be available to employees impacted by COVID-19. Information on COVID-19 benefits such as paid sick leave and workers' compensation benefits is posted on the Department of Industrial Relations' Coronavirus Resources webpage.
- HMS trains employees on the fact that COVID-19 is an infectious disease that can be spread through the air when an infectious person talks or vocalizes, sneezes, coughs, or exhales; that COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth, although that is less common; and that an infectious person may show no symptoms.
- HMS trains employees on the importance of physical distancing and wearing face coverings.
- HMS trains employees on 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.
- HMS trains employees on the importance of frequent hand washing for at least 20 seconds and use of hand sanitizer when handwashing facilities are not available.
- HMS trains employees on the proper use of face coverings, and the fact that they are not respiratory protection.
- HMS trains employees on the symptoms of COVID-19 and the importance of not coming to work and getting tested if an employee has symptoms.
- Employees are offered COVID-19 testing at no cost during their working hours.
- Information on benefits is described in Training and Instruction, and Exclusion of COVID-19 Cases will be provided to employees.

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.
- Once it has been determined when the COVID-19 case was last in the workplace, and if possible, the date of testing and onset of symptoms, the COVID-19 Prevention Plan is enacted.
- Administration first determines which employees may have been exposed to COVID-19.
- Then, employees are notified of any potential exposures within one business day (and notifying any other employer who has potentially exposed employees in the workplace).
- Testing is offered to potentially exposed employees at no cost and during working hours.
- Administration then investigates the exposure, whether workplace conditions could have contributed to the risk of exposure, and what corrections would reduce exposure.

- If the employee is able and available to work, HMS must continue to provide the employee's pay and benefits. HMS may require the employee to exhaust paid sick leave benefits before providing exclusion pay, to the extent permitted by law, and may offset payments by the amount an employee receives in other benefit payments. (Please refer to the Labor Commissioner's COVID-19 Guidance and Resources for information on paid sick leave requirements.). These obligations do not apply if an HMS establishes the employee's exposure was not work-related.
- If an employee is unable to work because of his or her COVID-19 symptoms, then he or she would not be eligible for exclusion pay and benefits under section 3205(c)(10)(C). The employee, however, may be eligible for Workers' Compensation or State Disability Insurance benefits.
- An employee would receive pay for the period the employee is quarantined, which could be up to 14 days (see above for potential impact of EO N-84-20). If an employee is out of work for more than a standard quarantine period based on a single exposure or positive test, but still does not meet the regulation's requirements to return to work, that extended quarantine period may be an indication that the employee is not able and available to work due to illness. . The employee, however, may be eligible for temporary disability or other benefits.
- HMS should take any reports seriously and should investigate any evidence of an exposure. It is ultimately HMS' responsibility to determine if an exposure occurred.
- 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.
- Recording COVID-19 Symptoms:
- Means fever of 100.4 degrees Fahrenheit or higher, chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, congestion or runny nose, nausea or vomiting, or diarrhea, unless a licensed healthcare professional determines the person's symptoms were caused by a known condition other than COVID-19.
- Following state and local health department reporting requirements:
- HMS shall contact the local health department when there are three or more COVID-19 cases in the workplace within a 14-day period.
- Provide the following information:
 - The total number of COVID-19 cases.
 - 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.
 - Any other information requested by the local health department.
- HMS shall continue to give notice to the local health department of any subsequent COVID-19 cases

at the workplace.

- Reporting serious occupational illnesses to Cal/OSHA, consistent with existing regulations. Maintaining records required by 8 CCR section 3203(b), which include inspection records, documentation of hazard corrections, and training records (requirements vary by employer size)
- Making the written COVID-19 Prevention Program available upon request to employees and employees' authorized representatives.
- Recording and tracking all COVID-19 cases with the employee's name, contact information, occupation, location where the employee worked, the date of the last day at the workplace, and the date of a positive COVID-19 test. Medical information shall be kept confidential. The information shall be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed. This does not prevent employees or their representatives from obtaining an employer's Log of Work-Related Injuries and Illnesses or other information as allowed by law.

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.
-



Dr. Janet Tufts, Superintendent

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: [enter name(s)]

Date: [enter date]

Name(s) of employee and authorized employee representative that participated: [enter name(s)]

| 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 |
|--|------------------|---|---|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

Appendix B: COVID-19 Inspections

[This form is only intended to get you started. Review the information available at www.dir.ca.gov/dosh/coronavirus/ for additional guidance on what to regularly inspect for, including issues that may be more pertinent to your particular type of workplace. You will need to modify form accordingly.]

Date: [enter date]

Name of person conducting the inspection: [enter names]

Work location evaluated: [enter information]

| Exposure Controls | Status | Person Assigned to Correct | Date Corrected |
|--|--------|----------------------------|----------------|
| Engineering | | | |
| Barriers/partitions | | | |
| Ventilation (amount of fresh air and filtration maximized) | | | |
| Additional room air filtration | | | |
| [add any additional controls your workplace is using] | | | |
| [add any additional controls your workplace is using] | | | |
| Administrative | | | |
| Physical distancing | | | |
| Surface cleaning and disinfection (frequently enough and adequate supplies) | | | |
| Hand washing facilities (adequate numbers and supplies) | | | |
| Disinfecting and hand sanitizing solutions being used according to manufacturer instructions | | | |
| [add any additional controls your workplace is using] | | | |
| [add any additional controls your workplace is using] | | | |
| PPE (not shared, available and being worn) | | | |
| Face coverings (cleaned sufficiently often) | | | |
| Gloves | | | |
| Face shields/goggles | | | |

| | | | |
|--|--|--|--|
| Respiratory protection | | | |
| [add any additional controls your workplace is using] | | | |

Appendix C: Investigating COVID-19 Cases

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

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

Date: [enter date]

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

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

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

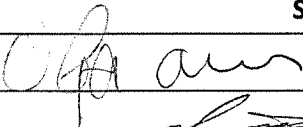
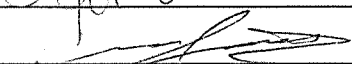
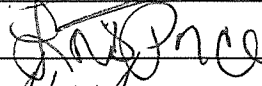
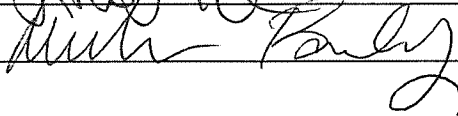
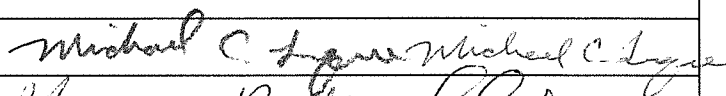
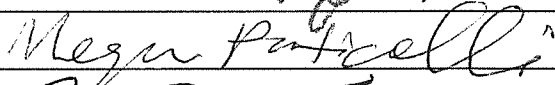
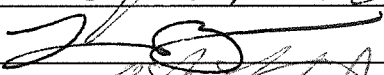


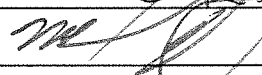

| Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to: | | | |
|---|---|---|--|
| All employees who may have had COVID-19 exposure and their authorized representatives. | Date: | | |
| |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

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

Appendix D: COVID-19 Training Roster

Date: October 30, 2020

Name of Person Conducting the Training: Dr. Janet Tufts

| Employee Name | Signature |
|------------------|--|
| Olga Arroyo |  |
| George Jones |  |
| Lori Price |  |
| Maddison Bailey |  |
| Ariana Bautista | |
| Elizabeth Avina | |
| Michael Luque |  |
| Megan Particelli |  |
| Lauren Bledsoe |  |
| Pete Fitzpatrick |  |
| Vinnie Rothwell |  |
| Michael Norris |  |
| Kelsey Hadfield |  |

Van Son



Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

[This section will be updated to this CPP if our 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 updated in our CPP should our 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**.