



**Burbank Unified School District
COVID-19 Prevention Program
February 1, 2021**

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This COVID-19 Prevention Program (CPP) is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace. It has been prepared in compliance with AB685 and the Cal/OSHA Emergency Temporary Regulation for COVID-19 Prevention Requirements (8 CCR 3205).

Last Revised: February 1, 2021

AUTHORITY AND RESPONSIBILITY

The 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.

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
- Work with each site's COVID Compliance Team to address any hazards brought to their attention

Employee Participation

Employees and their authorized employee representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by reporting any hazards or concerns to their immediate supervisor and/or using the WeTip anonymous reporting system by calling (800)873-7283 or online at www.WeTip.com.

All employees shall review the [Employee Health and Safety Resources Information for COVID-19](#) on the District website.

Employee Screening

We screen our employees by requiring every employee complete the online Daily Symptom Screener before coming to work or completing the [BUSD Employee Screening and Health Check](#) upon arrival.

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:

Burbank Unified has instituted the controls identified in [Appendix B](#) across all sites. The COVID Compliance Team, in conjunction with Site Administration and Department managers, will conduct hazard assessments in the workplace and correct hazards in a timely manner when it learns of deficiencies through spot checks, complaints, referrals, or reports of positive COVID-19 case reports.

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:

- Eliminating the need for workers to be in the workplace – e.g., telework or other remote work arrangements
- Reducing the number of persons in an area at one time, including visitors
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel
- Staggered arrival, departure, work, and break times
- Adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees

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; 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. Supplies are kept at sites for immediate distribution. Additionally:

- Replenishment of onsite supplies of face masks and shields and other PPE is made by submitting a requisition to the warehouse.
- Employees are responsible for the care and cleaning of their face coverings and may wear

other face coverings not provided by BUSD if the face coverings comply with Los Angeles County Department of Health guidelines.

- Employees and non-employees observed to not be wearing a face covering appropriately will be asked to don one unless they have an exemption as described below. If they do not have access to a face covering, the District will supply one to the employee or non-employee.

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

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

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons.

Engineering Controls

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

- Physical barrier installations (partitions) where feasible.
- Consultation with the COVID Compliance Team to determine if non-surgical N95 masks are appropriate for the type of work when other measures such as elimination, substitution, or administrative controls do not remove the hazard.

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

- Setting outdoor air handlers to 100% outdoor air where feasible, with reduced, or no recirculation of air.
- Installing MERV13 filters in building air handlers where feasible.
- Advising employees to open exterior windows for better ventilation where feasible.

During wildfire smoke impacts, mechanical ventilation systems will remain at 100% outdoor air settings. During Level 5 events, there will be no outdoor activity and all activities should be moved indoors; outdoor sporting events must be rescheduled or relocated. Schools may be closed based on site-by-site concerns.

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.

- Training employees on proper method of cleaning and disinfection and how to use disinfection equipment
- Cleaning and disinfecting procedures are outlined in the [Daily Site Cleaning Procedures](#).
- Facilities is responsible for daily disinfection of common-touch surfaces in public areas of District buildings. Departments are responsible for disinfection in areas they maintain. All individuals are required to disinfect their personal workspace surfaces.
- Departments are provided disinfection supplies by the Warehouse.
- Frequency of disinfection shall be at least daily, except that personal equipment shall be disinfected before and after use.
- Disinfection solutions shall be found on the [EPA List N – Disinfectants for Coronavirus](#).

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

- Potentially contaminated surfaces will be disinfected by District custodial staff.
- Disinfection and cleaning supplies shall be provided by the Warehouse to sites and departments for their own use through the requisition process.
- Custodians disinfect public areas and restrooms and high touch areas.

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 employees. The Warehouse provides approved disinfectant solution and supplies for department and employee use.

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users.

Hand Sanitizing

In order to implement effective hand sanitizing procedures, we are:

- Encouraging and allowing time for employee handwashing.
- Providing employees with an effective hand sanitizer and prohibiting hand sanitizers that contain methanol (i.e., methyl alcohol).
- Encouraging employees to wash their hands for at least 20 seconds each time.
- Hand sanitizing stations are provided at site/campus building entrances through Warehouse distribution. Hand sanitizer solutions meet minimum requirements for effectiveness.
- Hand washing facilities are available in all campus restrooms.
- Additional details on personal hygiene are available on the [District's website](#).

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:

- Offered COVID-19 testing at no cost during their working hours at various sites listed in the [Employee Health and Safety Resources Information for COVID-19](#).
- Provided information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, described below. Information on leave, pay, and work arrangements is available on the [District website](#).

SYSTEM FOR COMMUNICATING

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

- That employees can report symptoms and hazards without fear of reprisal.
 - Employees shall report COVID-19 symptoms and possible hazards to their supervisor and site nurses or Health Services at (818) 729-4504. The employee is advised through COVID-19 training, and by their supervisor and Health Services, to stay home and self-quarantine for 10 days and until symptoms resolve.
 - Employees report symptoms or positive test results to their site nurse or Health Services at (818) 729-4504. The members of Health Services, Student Services and the District COVID team will then conduct exposure management practices per LADPH. Human Resources advises employees regarding leave information.
 - Workplace hazards associated with COVID-19 can be reported to Student Services at (818)729-4456 or by email to StacyCashman@burbankusd.org, or anonymously to the WeTip hotline at (800)873-7283 or online at www.WeTip.com.
- 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. This may include testing by LA County, healthcare providers, 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.
 - COVID-19 hazard information is provided on the [District's website](#).

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.
- All employees completed a COVID-19 training provided online through our JPA
- All employees have received a *Staff Health and Safety Newsletter* containing updated information and important Covid-19 infection reduction practices.

Appendix E: 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:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Ensuring 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 with or without testing.
- 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:
 - Allowing them to work remotely when they can fulfill their duties from home
 - Information on employee benefits is available through the Human Resources department.
- Providing employees at the time of exclusion with information on available benefits and important health and safety information including public health recommendations for quarantine and isolation.

REPORTING, RECORDKEEPING, AND ACCESS

It is our policy to:

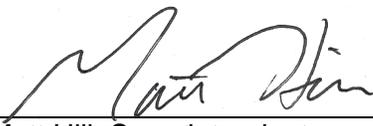
- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 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).
- Maintain a "[Dashboard](#)" on the website with numbers of reported cases
- Make our written COVID-19 Prevention Program available at the workplace to employees, to 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.
- Student Services will maintain a record of all case reports
- The District will notify all employees, unions, and contractors of positive COVID-19 case reports at District facilities, via email that links to a dashboard listing the workplace locations when a positive test is known. Positive COVID-19 case reports will be communicated within one business day.

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 10 days from the time the order to quarantine was effective.

This COVID-19 Prevention Program is formally approved by the Superintendent, Matt Hill, on the date signed below:

 <hr style="width: 100%;"/> Matt Hill, Superintendent	2/1/2021 <hr style="width: 100%;"/> Date
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This plan will be reviewed and updated periodically to ensure it reflects the most accurate interpretation of regulations and official guidance.

Plan updates and approval are listed below:

Date: _____, by _____

Date: _____, by _____

Date: _____, by _____

APPENDICES

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.

As per District reopening guidelines, buildings and operations have been evaluated by our site COVID Compliance Teams and/or the District Compliance Team to determine feasibility of occupation, operation, and essential functions that support the District. This includes a review of COVID-19 precautionary measures identified by several authorities, including the CDC, the California Department of Health, and the Los Angeles County Department of Public Health. Every effort has been made to provide a safe workplace for employees.

Continuous safety improvement is encouraged by all employees, departments, and sites. To that end, this **Appendix A: Identification of COVID-19 Hazards** worksheet is included in this CPP for reference and use by any District site or department. The District Compliance Team is available to assist with hazard evaluations.

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

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			
MERV-13 filters in HVAC unites			
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			
Scheduled or prescribed wide area disinfection using backpack or Clorox 360 sprayer			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Booties			
Gowns			

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\(s\)](#)

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: Potential COVID-19 Exposure Contact Tracing

Name/Title of Person Being Traced: _____

Date Form was Completed: _____

Date I was within 6 feet (with or without a mask) of this person	Duration (Total number of minutes during a 24-hour period)	Name/Title of the Person Involved	Location/Task Where Contact was Made

Appendix E: COVID-19 Training Roster

Date: [Enter date](#)

Person that conducted the training: [Enter name\(s\)](#)

Employee Name	Signature

Appendix F: Definitions

COVID-19	Coronavirus disease, an infectious disease caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2)
COVID-19 Case	<p>A person who:</p> <ul style="list-style-type: none"> (1) Has a positive “COVID-19 test” as defined in Section 3205 (2) Is subject to COVID-19-related order to isolate issued by a local or state health official; or (3) Has died due to COVID-19, in determination of a local health department or per inclusion in the COVID-19 statistics of a county. <p>A person is no longer a “COVID-19 case” in this section when a licensed health care professional determines that the person does not have COVID-19, in accordance with recommendations made by the California Department of Public Health (CDPH) or the local health department pursuant to authority granted under the Health and Safety Code or title 17, California Code of Regulations to CDPH or the local health department.</p>
COVID-19 Exposure	Being within 6 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 applies regardless of the use of face coverings.
COVID-19 Hazard	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 a person 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 Symptoms	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 health care professional determines the person’s symptoms were caused by a known condition other than COVID-19.
COVID-19 Test	<p>A viral test for SARS-CoV-2 that is:</p> <ul style="list-style-type: none"> (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 FDA Emergency Use Authorization as applicable.
Exposed Workplace	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, waiting areas. The exposed workplace does not include buildings or facilities not entered by

	<p>COVID-19 case.</p> <p>Effective January 1, 2021, the “exposed workplace” also includes but is not limited to the “worksite” of COVID-19 case as defined by Labor Code Section 6409.6(d)(5), which states:</p> <p>“Worksite” means the building, store, facility, agricultural field, or other location where a worker worked during the infectious period. It does not apply to buildings, floors, or other locations of the employer that a qualified individual did not enter. In multiworksite environment, the employer need only notify (per AB685) employees who were at the same worksite as the qualified individual.</p>
Face Covering	A tightly woven fabric or non-woven material with no visible holes or openings, which covers the nose and mouth.
High-Risk Exposure Period	<p>The following time period:</p> <ul style="list-style-type: none"> (1) For persons who develop COVID-19 symptoms: from 2 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: for 2 days before until 10 days after the specimen for their first positive test for COVID-19 was collected.

ADDITIONAL CONSIDERATIONS

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

In the event three or more positive COVID-19 cases are identified in the same worksite within a 14-day period, the following actions will be taken.

This section of the 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.

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

In the event there are 20 or more COVID-19 cases in the same workplace within a 30-day period, the following actions will be taken.

This section of the 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*.