

Franklin Elementary School
District
COVID – 19
Prevention Program (CPP)
Revised: September, 2021



K- 8th grade*

Superintendent/Principal: Lisa Shelton

COVID-19 Prevention Program (CPP) for Franklin Elementary School District

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

Date: September, 2021

Authority and Responsibility

Lisa Shelton, Superintendent/Principal has overall authority and responsibility for implementing the provisions of this CPP in our workplace.

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:

- 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.

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by notifying Lisa Shelton Superintendent/Principal of COVID concerns.

Employee screening

Daily symptom screening of all staff for COVID-19 symptoms including:

- All employees will be asked to self-screen before leaving for work to ensure temperatures below 100 degrees Fahrenheit and stay home if they have symptoms consistent with COVID-19 or have had close contact with a person diagnosed with COVID-19. Employees may return when they meet CDC guidance: [When You Can be Around Others After you Had or Likely Had COVID-19](#)
- Throughout the day, staff members who have a temperature 100.4 F or higher and/or demonstrate symptoms will leave campus to return home.
- Visual wellness checks
- COVID-19 questions

Correction of COVID-19 Hazards

The district believes in a safe and healthy work environment for all employees. Any unsafe or unhealthy work conditions, practices or procedures will be documented and will be corrected in a timely manner based on the severity of the hazards. The Superintendent or designee is responsible for scheduling timely correction and follow-up.

Control of COVID-19 Hazards

Physical Distancing

Physical distancing is an effective method that can help stop or slow the spread of an infectious disease by limiting the contact between people. For COVID-19, the recommended distance is at least 3 feet. To help prevent the spread of respiratory disease, employees should avoid close contact with people outside their household or those who are sick within their household.

Where possible, we ensure at least three feet of physical distancing at all times in the workplace by:

- Increasing physical space between employees by modifying the workspace and/or the use of physical barriers such as partitions.
- Avoiding shared workspaces (desks, offices, and cubicles) and work items (phones, computers, other work tools, and equipment) when possible. If they must be shared, cleaning and disinfecting shared workspaces and work items before and after use.
- Limit access to common areas where employees are likely to congregate and interact.
- Adhering to CDC recommendations for large work-related meetings or gatherings.
- When videoconferencing or teleconferencing is not possible, holding meetings in open, well-ventilated spaces continuing to maintain a distance of 3 feet apart and wear face coverings.

Employees will also be asked to practice social distancing outdoors including, but not limited to the following:

- When working in sports fields, playgrounds, assembly areas, and/or other outdoor areas.
- Before and after the work shift.
- Coming and going from vehicles.
- Entering and exiting physical buildings or other structures.
- During breaks and lunch periods.

Individuals will be kept as far apart as possible when there are situations where three feet of physical distancing cannot be achieved. Plexiglass will be used to separate employees when three feet of distancing cannot occur.

Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department. The district has a washer and dryer on site to launder any face masks if needed. Employees may also launder their own face masks.

Information will be provided to staff on [proper use, removal, and washing of cloth face coverings](#). The site has a supply of disposable masks for anyone who is unable to provide their own. For staff refusing to wear face coverings they will be sent home or asked to leave the premises.

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 three 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.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least three 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 three feet apart from all other persons.

Engineering controls

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

- For indoor locations, the district has evaluated how to maximize the quantity of outdoor air and whether it is possible to increase filtration efficiency to the highest level compatible with the existing ventilation system.

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

- Franklin School purchased new filters for all classroom ventilations systems. The filters are changed out every six months.
- Nine new HVAC units were purchased and installed during the fall of 2021.

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

- Buses will be thoroughly cleaned and disinfected daily. Drivers are provided disinfectant and gloves to support disinfection of frequently touched surfaces during route transportation.
- School spaces will be thoroughly cleaned and disinfected daily by trained custodial and other staff:
 - Handrails
 - Door handles/surfaces on doors that are touched frequently
 - Light switches
 - Sink handles
 - Tables
 - Student desks
 - Chairs
 - Staff desks
 - Keyboards, phones, copy machines
 - Restroom surfaces
- School staff will be provided disinfectant and gloves to support disinfection of frequently touched surfaces during the school day and as needed when children are present:
 - Door handles/surfaces on doors that are touched frequently
 - Light switches
 - Sink handles
 - Tables
 - Student desks
 - Chairs
 - Staff desks
 - Keyboards, phones
 - Toys, games, art supplies
 - Instructional materials
 - Physical education equipment
 - Technology (following the directions from the Data and Technology Coordinator)
- Ensure safe and correct application of disinfectant and keep products away from students. Provide employees training on manufacturer's directions, on Cal/OSHA requirements for safe use and as required by the Healthy Schools Act, as applicable.
- Custodial staff with the responsibility of cleaning and disinfecting the school site must be equipped with proper personal protective equipment, including gloves, eye protection, respiratory protection and other appropriate protective equipment as required by the product instructions. All products must be kept out of children's reach and stored in a space with restricted access.
- Ensure proper ventilation during cleaning and disinfecting. Introduce fresh outdoor air as much as possible, for example, by opening windows where practicable. When cleaning, air out the space before children arrive; plan to do thorough cleaning when children are not present. If using air conditioning, use the setting that brings in fresh air if possible. Replace and check air filters and filtration systems to ensure optimal air quality.

- If opening windows poses a safety or health risk (e.g., allowing pollen in or exacerbating asthma symptoms) to persons using the facility, consider alternatives. For example, maximize central air filtration for HVAC systems (targeted filter rating of at least MERV 13).

Additional cleaning measures as recommended by CDE and CDC are part of the Franklin School Reopening Plan. This includes cleaning and disinfecting buses and vehicles, school spaces and things, and providing increased ventilation whenever possible. In addition, we will continuously ensure we have the cleaning supplies necessary to enact all aspects of the plan; personal protective equipment will ensure personal health and safety for the staff who clean school facilities and vehicles. Our District aims to meet high cleanliness standards once reopening and to maintain a high level of cleanliness during the school year. Specific District details can be found in the Re-Opening Plan.

- All classrooms contain either hand washing stations or an ample supply of hand sanitizer.
- Plans for ongoing supply of school-appropriate cleaning supplies to comply with CDHP guidance. When choosing cleaning products, use those that are approved for use against Covid-19 on the Environmental Protection Agency (EPA) approved list and follow product instructions.
 - To reduce the risk of asthma related to disinfecting, custodial staff should aim to select disinfectant products with asthma-safe ingredients (hydrogen peroxide, citric acid or lactic acid).
 - Avoid products that mix these ingredients with peroxyacetic (peracetic) acid, sodium hypochlorite (bleach) or quaternary ammonium compounds, which can cause asthma.
 - Use disinfectants labeled to be effective against emerging viral pathogens, following label directions for appropriate dilution rates and contact times.
 - Establish a cleaning and disinfecting schedule in order to avoid both under- and over-use of cleaning products.
- Measures are in place to re-supply hand sanitizer, soap, tissues, and paper towels.

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

- Areas will be closed off and not used before cleaning and disinfecting
 - To reduce risk of exposure, custodial staff will wait 24 hours before cleaning and disinfecting
 - If it is not possible to wait 24 hours, staff will wait as long as feasible before cleaning and disinfecting
- Open outside doors and windows to increase air circulation in the area.
- Clean and disinfect all areas used by the sick person, such as offices, bathrooms, common areas, shared equipment.
- Cleaning and disinfecting must be done in a manner that does not create a hazard to employees.
- Wash hands immediately after removing gloves and after contact with a sick person.

- If more than 7 days since the sick person visited or used the facility, additional cleaning and disinfection is not necessary.
- Continue routine 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:

The district prohibits the sharing of personal protective equipment.

- The district will conduct a hazard assessment to determine if hazards are present in the workplace that necessitate the use of PPE.
- If the district identifies COVID-19 as a workplace hazard, it will select and provide exposed employees with properly fitting PPE that will effectively protect employees.
- The district will stress hand hygiene before and after handling all PPE.
- To the extent feasible, prohibiting the sharing of items that employees come in regular physical contact with such as phones, headsets, desks, keyboards, writing materials, instruments, and tools.
- When it is not feasible to prevent sharing, sharing shall be minimized and such items and equipment shall be disinfected between uses by different people.

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:

- Teach and reinforce using hand sanitizer or washing hands for 20 seconds with soap, rubbing thoroughly after application, and using paper towels to dry hands thoroughly when:
 - Entering the bus
 - Arriving at school
 - Before and after eating
 - After coughing, sneezing, or blowing the nose
 - After being outside
 - Before and after using the restroom
 - After having close contact with others
 - After using shared surfaces or tools
- Staff should model and practice using hand sanitizer or handwashing when:
 - Arriving at school
 - Before and after eating
 - After coughing, sneezing, or blowing the nose
 - After being outside
 - Before and after using the restroom
 - After having close contact with others
 - After using shared surfaces or tools

- Use fragrance-free hand sanitizer when handwashing is not practicable. Sanitizer must be rubbed into hands until completely dry. Note: frequent handwashing is more effective than the use of hand sanitizers. Children under the age of 9 should only use hand sanitizer under adult supervision. Methanol/Ethyl alcohol-based hand sanitizers are preferred and should be used when there is the potential of unsupervised use by children. Isopropyl hand sanitizers are more toxic and can be absorbed through the skin.
 - Build in time throughout the day for routine hand washing by both students and staff.
- Contact/Covering
 - Teach avoiding contact with one's eyes, nose, and mouth.
 - Teach covering coughs and sneezes: Use a tissue to wipe nose and cough/sneeze inside a tissue or their elbow.
- Signage
 - Post signs on how to stop the spread of COVID-19, properly wash hands, and promote everyday healthy hygiene practices.

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

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

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained

Investigating and Responding to COVID-19 Cases

The district follows the following guidelines:

Administrative Secretary Laurie Robertson, and Office Clerk Laurie Whalin were trained by Dr. Rice, Yuba County HHSD to conduct interviews and complete the required reporting forms. If an employee's absence is COVID related, School Portal for Outbreak Tracking is filled out and the protocols for symptoms or exposure started. Follow up occurs depending on which of the four scenarios the situation falls under. This can include a note from a health care provider or COVID-19 test results.

The District will take all of the following steps in response to a COVID-19 case in the workplace.

1. First, determine the day and time the COVID-19 case was last present and, to the extent possible, the date of the positive COVID-19 test(s), diagnosis, and/or the date the onset of COVID-19 symptoms, if any were experienced.

2. Then by evaluating the activities of the COVID-19 case and all locations at the workplace which may have been visited during the high-risk exposure period, determine potential exposures.
3. Franklin School gives 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 the following:
 - a. All employees who may have had COVID-19 exposure and their authorized representatives.
 - b. Independent contractors and other employers present at the workplace during the high-risk exposure period.
4. All employees who are not vaccinated will have a weekly COVID-19 test completed and submit the results to Laurie Robertson or Laurie Whalin. This screening will begin on October 15, 2021, dependent on the availability of testing kits.
5. All fully vaccinated employees will submit proof of vaccination to Office Staff.
6. The district will follow CDPH guidelines in regards to testing and vaccinations.
7. After each incident, the leadership team, investigates 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.

Confidentiality of Personal Identifying Information

All personally identifying information regarding COVID-19 cases or persons with COVID-19 symptoms shall be kept confidential

System for Communicating

Franklin School will use varied communication platforms (email, School Messenger, website posts, Facebook page, phone calls, printed mailings/handbooks) aimed to meet the needs of the preferred audience/s and in Spanish when requested. 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:

- How employees should report COVID-19 symptoms and possible hazards to, and how:

All employees of the district are to, without fear of reprisal, report to the Superintendent or designee any of the following:

Personal Symptoms or Exposure:

- To Whom: Employees are to report personal symptoms, exposures, and positive COVID-19 tests to Laurie Robertson, Contact Tracer.
- How: Employees should report this information immediately by email or phone call to Laurie Robertson (530) 822-5151.
- When: Immediately

Possible COVID-19 hazards at the workplace:

- To Whom: Hazards should be reported to the Superintendent or designee.
- How: Hazards can be reported in person, by email, or phone call.
- When: Immediately

Employees who are at a higher risk for complications as a result of COVID-19, can request a meeting with the Superintendent.

Employees wishing to access COVID-19 testing, where testing is not required, will be directed to their health care provider or county health department.

In the event the district is required to provide testing because of a workplace exposure or outbreak...

Employees can report symptoms and hazards without fear of reprisal.

The district will follow the procedures in the Section: Identification and Evaluation of COVID-19 Hazards to identify and evaluate COVID-19 hazards. Employees will be notified of potential hazards, what is being done to control those hazards, and the district's COVID-19 policies and procedures through training and this CPP.

- Where testing is not required, how employees can access COVID-19 testing. Employees can work with Laurie Robertson to obtain potential testing sites and information. For voluntary testing the expense of testing is through the employee's health care provider or the employee themselves.
- 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. If the district is required to provide testing because of an employee exposure, employees will work with Laurie Robertson and Laurie Whalin to be provided at no cost to the employee during working hours, including when the testing is in response to CCR Title 8 section [3205.1](#),
- 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.
- The Superintendent will communicate with students, staff and parents about cases and exposures at the school, adhering to privacy requirements such as FERPA and HIPAA. The Superintendent will follow CDPH guidelines as to who to inform and when, see Illness Prevention- Health Screenings for Students and Staff.

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 three 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 three 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.

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 the employee working with Stephanie Kuykendall, Fiscal Services Manager and Lisa Shelton, Superintendent/Principal to determine if the employee is entitled to employer-provided employee sick leave benefits, payments from public sources or other means of maintaining earnings, rights and benefits, where permitted by law and when not covered by workers' compensation.
- Providing employees at the time of exclusion with information on available benefits.

For employees excluded from work and otherwise able and available to work, the district shall continue and maintain an employee's earnings, seniority, and all other employee rights and benefits as if the employee had not been removed from their job. The district may use employer-provided employee sick leave benefits for this purpose and consider benefit payments from public sources in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers' compensation. This does not limit any other applicable law, employer policy, or collective bargaining agreement that provides for greater protections.

- EXCEPTION 1: does not apply to any period of time during which the employee is unable to work for reasons other than protecting persons at the workplace from possible COVID-19 transmission.
- EXCEPTION 2: does not apply where the employer demonstrates that the COVID-19 exposure is not work related.
- At the time of exclusion, the district shall provide the employee with information on available benefits as described in Training and Instructions and Exclusion of COVID-19 Cases
- *EXCEPTION to subsection (c)(10): Employees who have not been excluded or isolated by the local health department need not be excluded by the employer, if they are temporarily reassigned to work where they do not have contact with other persons until the return-to-work requirements of subsection (c)(11) are met.*

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.
- 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

- The district will ensure that we follow the current recommendations from CDPH for employees exposed to COVID-19 or employees with COVID-19 symptoms.

Guidance from the California Department of Public Health:

[Guidance on Returning to Work or School Following COVID-19 Diagnosis](#)

[Self-Quarantine Instructions for Individuals Exposed to COVID-19](#)

[Self-Quarantine Guidance for Individuals Exposed to COVID-19](#) These instructions are for people who have been in close contact with someone who has been diagnosed with COVID-19.

[Self-Isolation Guidance for Individuals Who Have or Likely Have COVID-19](#) These instructions are for people who have or likely have COVID-19. They include information for households, families, caregivers, or close contacts.

COVID Testing:

TSCIG Wellness Center

1174 Live Oak Blvd., Yuba City

(530)822-5500

Monday-Friday 8:00am to 7:00pm

Saturday 9:00am to 3:00 pm

Lisa Shelton, Superintendent/Principal

Date

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

[This section will need to be added to your CPP if your workplace is identified by a local health department as the location of a COVID-19 outbreak, or there are **three or more COVID-19 cases in your workplace within a 14-day period.** Reference section [3205.1](#) for details.]

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

COVID-19 testing

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

Exclusion of COVID-19 cases

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

Investigation of workplace COVID-19 illness

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

COVID-19 investigation, review and hazard correction

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

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
 - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
 - Our COVID-19 testing policies.

- Insufficient outdoor air.
- Insufficient air filtration.
- Lack of physical distancing.
- Updating the review:
 - Every thirty days that the outbreak continues.
 - In response to new information or to new or previously unrecognized COVID-19 hazards.
 - When otherwise necessary.
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We will consider:
 - Moving indoor tasks outdoors or having them performed remotely.
 - Increasing outdoor air supply when work is done indoors.
 - Improving air filtration.
 - Increasing physical distancing as much as possible.
 - Respiratory protection.

Notifications to the local health department

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

Additional Consideration #2

Major COVID-19 Outbreaks

[This section will need to be added to your CPP should your workplace experience 20 or more COVID-19 cases within a 30-day period. Reference section [3205.2](#) for details.]

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

COVID-19 testing

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

Exclusion of COVID-19 cases

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

Investigation of workplace COVID-19 illnesses

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

COVID-19 hazard correction

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

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

Notifications to the local health department

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