

COVID-19 Prevention Program (CPP) for the Gateway School



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Overview

This COVID-19 Prevention Program (CPP) is designed to control exposure to the SARS-CoV-2 virus that may occur in our workplace in compliance with AB 685 and the Cal/OSHA Temporary Emergency Standards. This plan complies with health and safety guidance from the [Centers for Disease Control and Prevention](#), [California Department of Public Health](#), and [Santa Cruz County Office of Education](#).

Authority and Responsibility

The Head of School along with the Senior Administrative team 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.

Definitions

For the purposes of the CPP, the following definitions shall apply:

- “COVID-19” means coronavirus disease, an infectious disease caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).
- “COVID-19 case” means a person who either: (1) Has a positive “COVID-19 test” as defined in this section; (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 the determination of a local health department or per inclusion in the COVID-19 statistics of a county. A person is no longer a “COVID-19 case” when a licensed health care professional determines that the person is no longer infected with the COVID-19 virus, in accordance with recommendations made by the California Department of Public Health (CDPH) and/or the Santa Barbara County Public Health Department.
- “Close contact COVID-19 exposure” means being within six (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”. This definition applies regardless of the use of face coverings.
- “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 symptoms” means one of the following: (1) fever of 100.4 degrees Fahrenheit or higher or chills; (2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches; (6) headache; (7) new loss of taste or smell; (8)

sore throat; (9) congestion; (10) nausea or vomiting; or (11) 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" means a viral test for SARS-CoV-2 that is both: (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 (2) days before they first develop symptoms until ten (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 (2) days before until ten (10) days after the specimen for their first positive test for COVID-19 was collected.

Identification and Evaluation of COVID-19 Hazards

We have and will continue to implement the following in our workplace:

- Conduct workplace-specific evaluations using the [Appendix A: Identification of COVID-19 Hazards](#) form.
- Evaluate employees' potential workplace exposure(s) to all persons at or who may enter our workplace.
- Review applicable orders and general and/or industry-specific guidance from the State of California, Cal/OSHA, and the local public health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the [Appendix B: COVID-19 Inspections form](#) as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.

Employee Participation

Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

- Researched federal, state, and local resources for office space return to work guidelines.
- Reviewed Injury and Illness Prevention Plan COVID-19 addendum.
- [On-Campus Health and Safety Protocols](#) created and reviewed with employees.
- Maintenance and Operations modified workspaces to be in compliance with COVID-19 safety precautions per guidelines and injury and illness prevention plan.
- Staff Training plan implemented.
- The following positions participate in school site reviews: **Facilities Manager, Director of Operations, Office Manager.**

Employee Screening

- Employees are instructed not to come to work if they are feeling any symptoms of an illness.
- All staff must complete a self-health screening and attest to passing the screening daily in our paper log or [google form](#). This requires staff to take their temperature at home prior to coming to work or upon arrival at the temperate kiosk at reception. Touchless thermometers may also be available at worksites for self-use. Signage is displayed reminding visitors and employees of wellness protocols.

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices, or procedures will be documented on [Appendix B: COVID-19 Inspections](#) form, and corrected in a timely manner based on the severity of the hazards, as follows:

- In an effort to maintain a safe and healthy place during the COVID-19 pandemic, staff are asked to use the [COVID-19 Inspection Form](#) to report any issues to either the Facilities Director or the Business Office.
- Staff are aware that reporting an issue will not result in corrective action or repercussions.

Control of COVID-19 Hazards

Physical Distancing

Where possible, we ensure at least six (6) feet of physical distancing at all times in our workplace by:

- Practicing safe physical distancing (6' or more) at all times and adhere to all CDC guidelines.
- Avoiding handshaking when greeting others.
- Avoiding congregating in lobbies, hallways, etc. and when moving about the workplace.
- Holding meetings that do not absolutely require a visit to the office via video conference.
- Limiting visiting the desks and offices of colleagues as much as possible. To contact another employee who is at the office, first try using your phone, Zoom and/or Google Hangouts.
- Staggering breaks and lunches to ensure physical distancing in break/lunchrooms.
- protocols. Non employee riders will not be allowed in School vehicles until further notice.

Individuals will be kept as far apart as possible when there are situations where six (6) 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. Employees are required to utilize a face covering at all times.

Exceptions for wearing a mask indoors include when a staff member is by themselves in an enclosed office space, for short times to take a drink or while eating in by oneself in an enclosed off or classrooms (staff are expected to eat outdoors whenever possible). Exceptions for wearing a mask outdoors are as follows; while eating or drinking and maintaining a minimum of 6' distance from others or while taking a mask break and maintaining a minimum of 10' distance from others. Employees who forget to bring a face covering will be provided one.

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

- When an employee is alone in a room and others are not expected to enter the room in the near future.
- While eating and drinking at the workplace, provided employees are outdoors and at least six (6) feet apart, if indoors, employees may not be in the same room with their mask off with one another.
- Employees wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six (6) feet apart.
- Taking a mask break while outdoors and maintaining a minimum of 10' distance from others.

Engineering controls

We implemented the following measures for situations where we cannot maintain at least six (6) feet between individuals:

- Personnel are encouraged to use their own reusable cloth face covering as often as possible to conserve PPE. Additional PPE will be provided to staff as needed.
- Gloves, sanitizing wipes, or disinfectant and paper towels, and hand sanitizer will be made available at supply hubs in each building.
- Sneeze guards have been installed where high-frequency customer service is performed (ie. front desk and high-traffic areas).

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

- The high-efficiency particulate air (HEPA) filtration systems at all sites currently meet the

recommended filtration level for safe air quality in our facilities and will routinely be inspected and maintained.

- Classrooms should be ventilated with outside air to the greatest extent possible in order to dilute indoor airborne contaminants and decrease disease transmission rates. For buildings without heating and ventilation systems, use gravity ventilation by opening doors and windows, across from one another, to encourage the introduction of outside air.

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

- Maximum occupancy for enclosed office spaces and conference rooms has been adjusted to comply with safe physical distancing requirements and will be adjusted throughout the site.
- Workstations have been adjusted to meet physical distancing requirements by facilities as needed. Additional modifications may be made upon request.
- High-tough sanitization will be performed daily in high traffic areas (doorknobs, railings, faucets, etc.).
- Facilities teams will only use disinfecting agents that have been EPA-approved for use against SARS-CoV-2.
- Deep cleaning will take place using electrostatic sprayers.
- Employees will be required to perform limited non-custodial cleaning and disinfecting of their own workstation and of shared items (ex. copiers, staplers, paper cutters, fridge doors, etc). The best practice to keep ourselves safe is to clean an item before AND after each use.
- Safe physical distancing and hygiene guidelines that prevent the spread of infectious disease are posted throughout the building in hallways, restrooms, conference rooms, waiting areas, and office spaces.
- Facilities will refill hand sanitizer bottles and cleaning supplies regularly and ensure hand soap is replenished daily.

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

- Close off areas visited by the ill person(s). Open outside doors and windows and use ventilating fans to increase air circulation in the areas. Wait 24 hours or as long as practical before beginning cleaning and disinfection.
- Cleaning staff should clean and disinfect all areas such as offices, bathrooms, common areas, shared electronic equipment (like tablets, touch screens, keyboards, remote controls) used by the ill person(s), focusing especially on frequently touched surfaces.

Shared tools, equipment, and personal protective equipment (PPE)

PPE must not be shared (gloves, goggles, face shields, etc).

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 will be required to perform limited non-custodial cleaning and disinfecting, such as at the employee's work station or use of shared equipment both before AND after each use,

e.g. copiers. Employees will be required to complete training on how to properly disinfect their workspaces.

- Custodians will clean and disinfect shared areas every night.

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

- Gateway vehicles shall be limited to a single occupant (driver) to the extent feasible and if/when more than one occupant is required all occupants are subject to all physical distancing protocols. Non-employee riders will not be allowed in Gateway vehicles until further notice.

Hand sanitizing

We are implementing effective hand sanitizing procedures in multiple ways:

- Handwashing guidance is posted in all restrooms and break rooms.
- Pedal-operated handwashing sinks have been installed in place of outdoor drinking fountains around campus.
- Teachers guide children on frequent handwashing with soap and water for a minimum of 20 seconds, including before and after each recess and eating period, as at any other necessary times.
- Over 35 touchless hand sanitizer stations have been installed on campus, including in some outdoor locations. Hand washing is always more effective than hand sanitizer, but if a sink is not in proximity, individuals may utilize the hand sanitizer stations.

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.

[Reference section 3205(c)(E) for details on required respirator and eye protection use.]

We provide and ensure the 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 offered COVID-19 testing at no cost during their working hours.
- Meet with the Human Resources Department to review information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.

- Review [Flow Chart](#) for COVID-19 exposure.

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 includes the following information:

- That employees should report COVID-19 symptoms and possible hazards to their immediate supervisors by telephone.
- That 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.
- How employees can participate in weekly Surveillance Testing.
- In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employee(s) 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.

Communication Plan for an employee who is symptomatic or aware of exposure

- The employee must contact their immediate supervisor immediately by telephone.
- The supervisor then reports this information to:

Director of Facilities (DoF) or Head of School if DoF is not available.

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 following information:
 - 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 (6) 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 (6) 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 handwashing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or handwashing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- [Appendix D: COVID-19 Training Roster](#) will be used to document all trainings held after this CPP is published.

Exclusion of COVID-19 Cases

Where we have a COVID-19 case in our workplace, we will limit transmission by:

- Ensuring that the COVID-19 case is excluded from the workplace until the appropriate 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, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work-related.](#)
- 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 public health department whenever required by law, and provide any related information requested by the local public 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 CPP in accordance with [CCR Title 8 section 3203\(b\)](#).
- Make our written CPP available at the workplace to employees, authorized employee representatives, and representatives of Cal/OSHA immediately upon request.
- Use the [Appendix C: Investigating COVID-19 Cases](#) form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until one of 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 has 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.

This CPP has been reviewed and approved

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Date

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, break or eating 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

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. 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			
Administrative			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Handwashing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			

Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 testing or related medical services provided by us will be provided in a manner that ensures the confidentiality of employees, with the exception of unredacted information on COVID-19 cases that will be provided immediately upon request to the local public 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 public 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):			

<p>Notice is 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:</p>			
<p>All employees who may have had COVID-19 exposure and their authorized representatives.</p>	<p>Date:</p>		
	<p>Names of employees that were notified:</p>		
<p>Independent contractors and other employers present at the workplace during the high-risk exposure period.</p>	<p>Date:</p>		
	<p>Names of individuals that were notified:</p>		
<p>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</p>		<p>What could be done to reduce exposure to COVID-19?</p>	
<p>Local public health department notified? Yes or No</p>		<p>Date:</p>	

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

Appendix D: COVID-19 Training Roster

Date: **[enter date]**

Person that conducted the training: **[enter name(s)]**

Employee Name	Signature

Multiple COVID-19 Infections and COVID-19 Outbreaks

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

COVID-19 testing

- We will provide COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local public 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 public 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 public 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 30 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 public health department

- Immediately, but no longer than 48 hours after learning of three (3) or more COVID-19 cases in our workplace, we will contact the local public health department for guidance on preventing the further spread of COVID-19 within the workplace.
- We will provide to the local public 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 public health department. We will continue to give notice to the local public health department of any subsequent COVID-19 cases at our workplace.

Major COVID-19 Outbreaks

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

COVID-19 testing

We will provide twice a week COVID-19 testing, or more frequently if recommended by the local public 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 public 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 public health department

We will comply with the requirements of our **Multiple COVID-19 Infections** and **COVID-19 Outbreaks-Notifications to Santa Cruz County Public Health**.