



COVID-19 Prevention Program (CPP)

Overview

On November 19, 2020, the California Department of Industrial Relations (DIR) Occupational Safety and Health Standards Board unanimously adopted [emergency temporary regulations](#) regarding measures that all employers, including schools and community colleges, must undertake in order to prevent the spread of COVID-19 in the workplace. On November 30, 2020, the Office of Administrative Law approved the temporary workplace safety standards, to take effect immediately.

Local educational agencies must take immediate action to ensure their policies and protocols conform with the new regulations, which supplements general and industry-specific guidance that the Division of Occupational Safety and Health (Cal/OSHA) has provided since the beginning of the COVID-19 pandemic. The standards provide limited exceptions for businesses where all employees work remotely or only one employee is employed who does not have contact with others. In addition, the District shall abide by all CalOSHA requirements as set forth in AB685.

Employers must prepare, implement, and maintain a written COVID-19 Prevention Program (CPP), in a form readily understandable for employees. To conform to new regulations as well as guidance from Cal/OSHA, San Ysidro School District has prepared the following CPP which is directly related to the SYSD COVID-19 Prevention Plan for Schools revised on August 8, 2020.

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

Updated, January 21, 2021

Authority and Responsibility

David Farkas, Ed.D. Assistant Superintendent of Educational Leadership, Pupil Services and Safety 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.

Staff with COVID-19 symptoms will be assisted by the Human Resources Department for best options to continue working remotely and/or using the appropriate leave. Staff will communicate with the district's safety officer to determine return dates to work on site and will share with their supervisor through the district's symptoms survey ensuring they have been free of symptoms and fever for at least three days prior to returning to on-site work. Staff may work from home if necessary and communicate with their supervisor.

Students with COVID-19 symptoms will be provided support through the Distance Learning model.

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

All district stakeholders including families will receive updates on testing locations and health guidance from the County Health Department periodically as needed. A summary of the guidance described in the California Department of Public Health (CDPH) [July 17, reopening framework](#) on cohort, school and district closures is provided. District and school leaders should always consult with the Public Health Services, Epidemiology Branch before deciding to close a class, school, or district to in-person instruction.

Health Screenings for Students and Staff

We screen our employees by: The district has established a health screening survey for employees to complete prior to reporting to work. The health screening survey is constructed for employees to verify and report symptoms. Upon arrival at work sites, staff utilize temperature check stations to ensure their temperature is below 100 degrees fahrenheit. These procedures have been communicated to all staff and are posted for all visitors as they enter any district site. Upon entry of school campuses, students will be screened by staff with face coverings worn using symptom check questionnaires and temperature checks measured by walk through temperature monitoring devices or touchless thermometers.

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 School administrators will serve as liaisons and will work directly with the district's safety officer and HR Department.

Liaisons are responsible for responding to COVID-19 concerns. Staff can contact liaisons, Human Resources, and/or the district's safety officer, Dr. David Farkas. The liaisons are trained to coordinate with the district's safety officer regarding documentation and tracking of possible exposure, in order to notify local health officials, staff and families in a prompt and responsible manner.

All staff have received training for PPE, Staff will be trained on the proper use, removal and washing of face coverings, procedures upon entering school sites and district office, sanitation practices, screening practices.

As the district prepares to return to in person learning on SYSD campuses, staff, parents and students will continue to receive information, and updates regarding the following safety actions:

- a. Enhanced sanitation practices
- b. Physical distancing guidelines and their importance
- c. [Proper use, removal, and washing of face coverings](#)
- d. Screening practices
- e. How COVID-19 is spread
- f. COVID-19 specific [symptom](#) identification
- g. Preventing the spread of COVID-19 if you are sick, including the importance of not coming to work if staff members have symptoms, or if they or someone they live with has been diagnosed with COVID-19.

- h. For workers, COVID-19 specific [symptom](#) identification and when to seek medical attention
- i. The employer's plan and procedures to follow when children or adults become sick at school.
- j. The employer's plan and procedures to protect workers from COVID-19 illness (COVID-19 Prevention Plan for Schools & CPP)

The severity of the hazard will be assessed by supervisors in collaboration with the assistant superintendent. Correction time frames will be assigned by the assistant superintendent in collaboration with district support departments and labor groups based on individuals identified as being responsible for corrections along with follow up measures and timeframes to correct.

Control of COVID-19 Hazards

Physical Distancing

San Ysidro School District is committed to ensuring physical distancing at all campuses and workplaces. To support physical distancing, many measures have been established including the scheduling of class rosters to maintain stable student cohorts in elementary schools and as much as possible in middle schools.

We ensure at least six feet of physical distancing at all times in our workplace by:
Limit entrance, egress, and movement with to 2-3 access points per school or building
At least, 2 staff members doing temperature checks per school point of entry.

Signage on the ground, around the building and outside areas remind students where to stand to comply with social distancing.

Entry and Dismissal times will be staggered to limit the amount of students entering campus and to allow for screening.

Elementary school students will be supervised as they enter the school and walk directly to their classroom and take their assigned seat.

Staff work stations will be staggered at least six feet apart and will in most areas have plexi-glass barriers between workstations.

Staff assignments will be designated based on distancing and during the work day no staff member will ride with another in the same vehicle.

Staff work schedules will be modified when appropriate. These schedules include staggering shift hours to reduce interaction among staff, half days on sites with the other half of the work day from home, every other day for staff to prevent interaction among staff in common areas. Social distancing markers will be placed at the bus stops on school property.

Before boarding the bus, students' temperatures will be taken by the bus driver or available support staff. Students with a temperature of 100 degrees or higher will not be permitted to ride the bus. Stickers will be placed on bus seats to identify where students will be permitted to sit.

Students will enter buses with masks on. Bus drivers will have extra masks on hand. Social distancing measures will be in place on buses and encouraged at bus stops. A limited number of students will be placed on a bus based on social distance and bus capacity ratios.

Specific workplace methods include:

Having staff telework and/or work onsite part time, when possible, for distance learning and when schools are closed.

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.

Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved. Except in very rare circumstances, a minimum distance of four feet apart will be maintained. Staff will be provided additional PPE including face shields, additional plexi-glass, gloves.

Voluntary PPE will be provided such as: Fitted N-95 masks, respirators, protective clothing/suits.

In classrooms, student workstations will be separated at a distance of six feet.

At the elementary school level, class rosters will be created for the blended learning model to ensure six feet of distance between students as well as the same students together in a cohort.

At the middle school level, class rosters will be created for the blended learning model to ensure six feet of distance between students as well as maintaining stable cohorts as much as master scheduling will permit in organizing a comprehensive instructional program.

Face Coverings

All students, employees, and visitors are required to wear face coverings at all times (unless they are exempt according to state and county health guidelines) while in public or in shared spaces on campus unless doing so would damage their health. For staff who come into routine contact with others, CDPH recommends the use of disposable 3-ply surgical masks, which are more effective than cloth face coverings. Staff will be provided with the option of utilizing a district provided surgical blue mask. Students in all grade levels K-12 are required to wear face coverings at all times, while at school, unless exempted. Students in Preschool and T/K will be expected to wear face coverings while on campus. A cloth face covering or face shield should be removed for meals, snacks, naptime, or when it needs to be replaced. When a cloth face covering is temporarily removed, it should be placed in a clean, safe area, clearly marked with the student's name and date, until it needs to be put on again.

A cloth face covering is typically a reusable item made from cloth fabric. It serves to protect others from exposure to illnesses the wearer may be carrying. This is the appropriate protection for students and should be laundered in a washing machine daily after use.

Employees and students will be provided a district issued cloth face covering. They may also bring a cloth face covering of their choice from home to wear, if they prefer as long as it covers both the mouth and nose.

A disposable surgical mask is a disposable face covering approved for health care environments. These are generally reserved for health care workers and emergency responders but may be used by employees and students. Surgical face masks will be available to all employees with easy access for those working in the health clerk offices, isolation areas, school front offices, and child nutrition areas. Surgical face masks will also be made available to employees and students who may be medically fragile or more vulnerable to COVID-19. Surgical face masks will be available for all staff, weekly or on an as needed basis.

Schools staff will also reinforce the use of face masks for all students, according to the following guidelines.

All students must wear face coverings while on campus.

Exceptions: Students with special needs not able to wear masks (i.e. medical and/or IEP based with accommodations for safety precautions such as face shields, additional plexi-glass, gloves)

Voluntary: Fitted N-95 masks, respirators, protective clothing/suits

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 which may include face shields, additional plexi-glass barriers, and additional distancing.

Plexiglass will be used in classrooms where any students cannot wear face covering.

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.

Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

Engineering controls

We implement the following measures for situations where we cannot maintain at least six feet between individuals: plexi-glass partitions between workstations are installed in all offices.

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

The district will be increasing all HVAC units that have economizers to 100% fresh air intake in order to increase outside air and proper ventilation in classrooms, offices and common areas.

The HVAC units that do not have economizers attached to the unit due to the age of the unit, this includes portable classrooms, will have air purification/scrubber units (Merv-11 filters) and GPS units installed in order to clean the air in the portable classrooms.

Healthy Hygiene Practices

Cleaning and disinfecting

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

- All work areas are supplied with disinfectant supplies for adequate disinfection.
- Custodians also wipe down all touch points (door handles, restrooms) every hour.
- Employees are informed of the frequency of cleaning and disinfecting.

Should we have a COVID-19 case in our workplace, we will implement the following procedures: After a report of a positive case in a school district area, the area will be closed until trained maintenance staff will sanitize the area with Clorox 180 within 24 hours.

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 utilizing disinfecting products.

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seat belt buckles, armrests, shifter, etc.) will be disinfected between users. Employees using transportation during work hours are required to follow all safety requirements and do not ride together to locations. District vehicles are disinfected after use.

Hand sanitizing

In order to implement effective hand sanitizing procedures:

Hand washing stations will be placed near relocatable classrooms that do not have sinks. Soap supply will be checked and maintained daily.

Most classrooms have sinks for hand washing use.

District staff will provide a video to schools to be shared with teachers, classified employees and parents regarding these procedures.

Schools will develop hand washing schedules with staggered times for students.

Handwashing stations will be placed throughout the school at appropriate places.

Develop routines enabling students and staff to regularly wash their hands at staggered intervals.

Develop routines enabling students and staff to use hand sanitizer when necessary.

Each classroom will have access to hand sanitizer and hand washing areas with students trained on procedures entering /exiting the classroom, as well as during class time.

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

We evaluate the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380 <https://www.dir.ca.gov/title8/3380.html>, and provide such PPE as needed.

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 <https://www.dir.ca.gov/title8/5144.html>, 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 use of eye protection and respiratory protection in accordance with section 5144 <https://www.dir.ca.gov/title8/5144.html>, 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:
Staff reports any symptoms or contact with a positive case to their supervisor.
Contact tracing then begins at the district level led by the district's safety officer and employee.

Continuation of paid status is required if an employee contracts COVID-19 at work or is directed to quarantine due to exposure at work.
Updates regarding prevention measures are shared through email and constant contact. These updates also include notifications of a positive case and the site the individual was located.

School district employees will also be informed of cost free school personnel testing locations. A district-wide testing program with scheduled dates for each employee group is established which provides an eight-week rotation for all to test. Proof of testing will be submitted to the district's safety officer.

At any time students exhibiting symptoms of COVID-19 will be quarantined in the school's isolation area until they are picked up by a family member.

System for Communicating

Our goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and that it includes the following information:
Employees report COVID-19 symptoms and possible hazards to their supervisor.

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.

The district communicates positive cases directly to the County Health Department for immediate contact tracing support.

After the identification of a positive case, contacts of potential exposure are notified as well as a district-wide notification is sent to all SYSD stakeholders.

Testing

In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test.

School district employees will also be informed of testing locations.

While schools are providing distance learning only along with the in-person ASES care program a district-wide testing program with scheduled dates for each employee group is established which provides an eight-week rotation for all to test. Proof of testing will be submitted to the district's safety officer.

When schools open for the hybrid program and specialized cohorts the testing cadence will be weekly for the Deep Purple, and every other week for the Purple and Red Tiers.

All district stakeholders including families will receive updates on testing locations, notification of positive cases on SYSD sites, and health guidance from the County Health Department.

Training and Instruction

We will provide effective training and instruction to staff and families that include:

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, local laws, Board Policies (BP), Collective Bargaining Agreements (CBA) and active Memorandums of Understanding (MOU).

The fact that:

COVID-19 is an infectious disease that can be spread through the air.

COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.

An infectious person may have no symptoms.

Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.

The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.

The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.

Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.

COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

Appendix D: COVID-19 Training Roster will be used to document this training.

Exclusion of COVID-19 Cases

Where we have a COVID-19 case in our workplace, we will limit transmission by:
Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.

Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.

Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished by

Providing employees at the time of exclusion with information on available benefits. Staff with COVID-19 symptoms will be assisted by the Human Resources Department for best options to continue working remotely and/or using the appropriate leave. Staff will communicate with the district's safety officer to determine return dates to work on site and will share with their supervisor through the district's symptoms survey ensuring they have been free of symptoms and fever for at least three days prior to returning to on-site work. Staff may work from home if necessary and communicate with their supervisor.

Reporting, Recordkeeping, and Access

It is our policy to:

Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.

Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.

Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).

Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.

Use the **Appendix C: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

Upon notification that an employee or student has been infected with COVID-19, SYSD will notify the County Public Health Department.

Reporting information is sent directly to the CPHD by the district's safety officer. All positive cases will be kept on record with the district's safety officer and reported to the CPHD and employee representatives from both CSEA and SYEA.

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 degrees or higher has resolved without the use of fever-reducing medications.
- COVID-19 symptoms have improved consistent with State and County Health Guidelines.
- At least 10 days have passed since COVID-19 symptoms first appeared.

COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.

A negative COVID-19 test will not be required for an employee to return to work.

If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.

Consultation

The district has consulted the SYSD COVID-19 Prevention Plan, plan for testing of staff and students and the COVID-19 School Guidance Checklist with both labor union SYEA and CSEA leadership teams. Through this process, Memorandums of Understanding (MOU) have been agreed upon that support the implementation of the COVID-19 School Safety Plan. Parent and community organizations have also been consulted with regarding the plan as evidenced on the COVID-19 Guidance Checklist.

David Farkas, Assistant Superintendent
Educational Leadership, Pupil Services & Safety
San Ysidro School District

Date: 1/21/21

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.

Person conducting the evaluation: **[enter name(s)]**

Date: **[enter date]**

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

Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards	Places and times	Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers	Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation

Appendix B: COVID-19 Inspections

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

Date: [enter date]

Name of person conducting the inspection: [enter names]

Work location evaluated: [enter information]

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			

Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
[add any additional controls your workplace is using]			
[add any additional controls your workplace is using]			
Administrative			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
[add any additional controls your workplace is using]			
[add any additional controls your workplace is using]			
PPE (not shared, available and being worn)			

Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
[add any additional controls your workplace is using]			

Appendix C: Investigating COVID-19 Cases

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

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

Date: **[enter date]**

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

Employee (or non-employee*) name:		Occupation (if non-employee, why they were in the workplace):	
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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:	

ould 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

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.
 - describe other applicable controls].

Notifications to the local health department

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

Additional Consideration #2

Major COVID-19 Outbreaks

[This section will need to be 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**.

Additional Consideration #3

COVID-19 Prevention in Employer-Provided Housing

[This section will need to be added to your CPP if you have workers in employer-provided housing. Reference section 3205.3 for details. Employer-provided housing is any place or area of land, any portion of any housing accommodation, or property upon which a housing accommodation is located, consisting of: living quarters, dwelling, boardinghouse, tent, bunkhouse, maintenance-of-way car, mobile home, manufactured home, recreational vehicle, travel trailer, or other housing accommodations. Employer-provided housing includes a “labor camp” as that term is used in title 8 of the California Code of Regulations or other regulations or codes. The employer-provided housing may be maintained in one or more buildings or one or more sites, including hotels and motels, and the premises upon which they are situated, or the area set aside and provided for parking of mobile homes or camping. Employer-provided housing is housing that is arranged for or provided by an employer, other person, or entity to workers, and in some cases to workers and persons in their households, in connection with the worker’s employment, whether or not rent or fees are paid or collected.

- This section does not apply to housing provided for the purpose of emergency response, including firefighting, rescue, and evacuation, and support activities directly aiding response such as utilities, communications, and medical operations, if:
 - The employer is a government entity; or
 - The housing is provided temporarily by a private employer and is necessary to conduct the emergency response operations.
- The requirements below for Physical distancing and controls, Face coverings, Cleaning and disinfecting, Screening, and Isolation of COVID-19 cases and persons with COVID-19 exposure do not apply to occupants, such as family members, who maintained a household together prior to residing in employer-provided housing, but only when no other persons outside the household are present.]

Assignment of housing units

We will ensure that shared housing unit assignments are prioritized in the following order:

- Residents who usually maintain a household together outside of work, such as family members, will be housed in the same housing unit without other persons.
- Residents who work in the same crew or work together at the same worksite will be housed in the same housing unit without other persons.
- Employees who do not usually maintain a common household, work crew, or worksite will be housed in the same housing unit only when no other housing alternatives are possible.

Physical distancing and controls

We will ensure:

- The premises are of sufficient size and layout to permit at least six feet of physical distancing between residents in housing units, common areas, and other areas of the premises.
- Beds are spaced at least six feet apart in all directions and positioned to maximize the distance between sleepers’ heads. For beds positioned next to each other, i.e., side by side, the beds will be arranged so that the head of one bed is next to the foot of the next bed. For beds positioned across from each other, i.e., end to end, the beds will be

arranged so that the foot of one bed is closest to the foot of the next bed. Bunk beds will not be used.

- Maximization of the quantity and supply of outdoor air and increase filtration efficiency to the highest level compatible with the existing ventilation system in housing units.

Face coverings

We will provide face coverings to all residents and provide information to residents on when they should be used in accordance with state or local health officer orders or guidance.

Cleaning and disinfection

We will ensure that:

- Housing units, kitchens, bathrooms, and common areas are effectively cleaned and disinfected at least once a day to prevent the spread of COVID-19. Cleaning and disinfecting shall be done in a manner that protects the privacy of residents.
- Unwashed dishes, drinking glasses, cups, eating utensils, and similar items are not shared.

Screening

We will encourage residents to report COVID-19 symptoms to **[enter name of individual, position, or office]**.

COVID-19 testing

We will establish, implement, and maintain effective policies and procedures for COVID-19 testing of occupants who had a COVID-19 exposure, who have COVID-19 symptoms, or as recommended by the local health department.

Isolation of COVID-19 cases and persons with COVID-19 exposure

We will:

- Effectively isolate COVID-19 exposed residents from all other occupants. Effective isolation will include providing COVID-19 exposed residents with a private bathroom, sleeping area, and cooking and eating facility.
- Effectively isolate COVID-19 cases from all occupants who are not COVID-19 cases. Effective isolation will include housing COVID-19 cases only with other COVID-19 cases, and providing COVID-19 case occupants with a sleeping area, bathroom, and cooking and eating facility that is not shared by non-COVID-19-case occupants.
- Keep confidential any personal identifying information regarding COVID-19 cases and persons with COVID-19 symptoms, in accordance with our CPP **Investigating and Responding to COVID-19 Cases**.
- End isolation in accordance with our CPP **Exclusion of COVID-19 Cases and Return to Work Criteria**, and any applicable local or state health officer orders.

Additional Consideration #4

COVID-19 Prevention in Employer-Provided Transportation to and from Work

[This section will need to be added to your CPP if there is employer-provided motor vehicle transportation to and from work, which is any transportation of an employee, during the course and scope of employment, provided, arranged for, or secured by an employer including ride-share vans or shuttle vehicles, car-pools, and private charter buses, regardless of the travel distance or duration involved. Reference section 3205.4 for details.]

This section does not apply:

- If the driver and all passengers are from the same household outside of work, such as family members.
- To employer-provided transportation when necessary for emergency response, including firefighting, rescue, and evacuation, and support activities directly aiding response such as utilities, communications and medical operations.]

Assignment of transportation

We will prioritize shared transportation assignments in the following order:

- Employees residing in the same housing unit will be transported in the same vehicle.
- Employees working in the same crew or worksite will be transported in the same vehicle.
- Employees who do not share the same household, work crew or worksite will be transported in the same vehicle only when no other transportation alternatives are possible.

Physical distancing and face coverings

We will ensure that the:

- Physical distancing and face covering requirements of our CPP **Physical Distancing** and **Face Coverings** are followed for employees waiting for transportation.
- Vehicle operator and any passengers are separated by at least three feet in all directions during the operation of the vehicle, regardless of the vehicle's normal capacity. Vehicle operator and any passengers are provided and wear a face covering in the vehicle as required by our CPP **Face Coverings**.

Screening

We will develop, implement, and maintain effective procedures for screening and excluding drivers and riders with COVID-19 symptoms prior to boarding shared transportation.

Cleaning and disinfecting

We will ensure that:

- All high-contact surfaces (door handles, seatbelt buckles, armrests, etc.) used by passengers are cleaned and disinfected before each trip.
- All high-contact surfaces used by drivers, such as the steering wheel, armrests, seatbelt buckles, door handles and shifter, are cleaned and disinfected between different drivers.
- We provide sanitizing materials, training on how to use them properly, and ensure they are kept in adequate supply.

Ventilation

We will ensure that vehicle windows are kept open, and the ventilation system set to maximize outdoor air and not set to recirculate air. Windows do not have to be kept open if one or more of the following conditions exist:

- The vehicle has functioning air conditioning in use and the outside temperature is greater than 90 degrees Fahrenheit.
- The vehicle has functioning heating in use and the outside temperature is less than 60 degrees Fahrenheit.
- Protection is needed from weather conditions, such as rain or snow.
- The vehicle has a cabin air filter in use and the U.S. EPA Air Quality Index for any pollutant is greater than 100.

Hand hygiene

We will provide hand sanitizer in each vehicle and ensure that all drivers and riders sanitize their hands before entering and exiting the vehicle. Hand sanitizers with methyl alcohol are prohibited.

REFERENCES

- [Cal/OSHA FAQs](#)
- [Cal/OSHA Factsheet on Regulations](#)
- [Cal/OSHA Aerosol Transmissible Diseases Standard](#)
- [Cal/OSHA Emergency Regulations to Protect Workers from COVID-19 in Effect Press Release](#) (December 1, 2020)
- [Coalition Letter Raising Concerns Regarding Emergency Regulations](#) (November 18, 2020)
- [SYSD Pandemic Threat Annex](#)
- [Testing in San Diego County](#)
- [Social Distancing and Sanitization](#)
- [Industry Guidance](#)
- [SYSD COVID-19 Prevention Plan for Schools](#)
- [ORDER OF THE HEALTH OFFICER \(Isolation of All Persons with or Likely to have COVID-19\)](#)
- [ORDER OF THE HEALTH OFFICER \(Quarantine of Persons Exposed to COVID-19\)](#)

- <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Safe-Schools-for-All-Plan-Summary.aspx>
- <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Safe-Schools-for-All-Plan-Rationale.aspx>
- <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Vaccine-Prioritization.aspx>
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