COVID-19 Prevention Program (CPP)

January 20, 2021
COVID-19 Prevention Program (CPP) for the Oroville Union High School District

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

Date: January 4, 2021

Authority and Responsibility
Superintendent Dr. Corey Willenberg 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:

- 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.
- Ongoing evaluation of 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 and their bargaining units are encouraged to participate in the identification and evaluation of COVID-19 hazards. Both labor unions (CSEA and OSTA) met and developed Memorandums of Understanding to develop safety protocols. The MOU with OSTA was agreed upon on October 27, 2020 and the MOU with CSEA Feather River Chapter #342 was agreed upon on August 11, 2020.

Employee screening
All staff are required to self-screen for symptoms prior to arriving at work. A Daily Wellness Checklist is available on the District website along with a COVID-19 Exposure information sheet provided by the Butte County Public Health Department. OUHSD requires that all staff and students wear facial coverings at all times. All teachers and administrators are provided or have access to a touchless thermometer. Additionally, OUHSD is participating in voluntary district-wide surveillance testing of all staff every two months. Staff who test positive for COVID-19 and are asymptomatic are required to quarantine for ten days. The CDC currently does not recommend that schools screen students grades K-12. Families are strongly encouraged to monitor their children for signs of infectious illness every day and keep sick children at home.
Butte County Public Health does not have a requirement at this time to test all students and staff for COVID-19. The State of California has not mandated that staff and students must receive the vaccine when it becomes available. Staff and students will be reminded to wash their hands frequently and use hand sanitizer when entering classrooms and common areas when handwashing sinks are not available.

Parents have been informed about COVID-19 symptoms and are expected to keep their student home if they are feeling ill or have been exposed to someone who has tested positive. Schools have identified main access points on campus to limit multiple students entering or exiting the school or rooms at the same time. Signage has been placed in hallways and stairways so students walk in the same direction to enter and exit.

Custodians will sanitize classrooms on a daily basis. Additional staff who have been trained to use district-approved disinfectants may also clean restrooms, desks or frequently touched surfaces, such as door knobs, throughout the day.

Students cannot help with cleaning under any circumstance. Schedules of custodial staff may be adjusted as necessary to meet the demand of disinfecting schools while students and staff are present. Hand sanitizing dispensers are installed in all classrooms where soap and water is not available and in targeted areas throughout the schools.

Restrooms will be closed on a rotating basis throughout the day to allow for multiple cleanings. Water fountains have been turned off but the water filling stations are still be operational and cleaned regularly. Students are encouraged to bring water bottles or canteens from home.

HVAC fans will be run continuously, regardless if doors and windows are open, and filters will be changed regularly. To prevent the spread of COVID-19, students were not assigned textbooks or hall lockers. Teachers assigned seats in all of their classes and social distancing is enforced as practicable.

**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 hazard. Jim LaGrone, Director of Facilities, Information Technology and Transportation, will coordinate with school and district staff to identify and correct COVID-19 Hazards.

**Control of COVID-19 Hazards**

**Physical Distancing**

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

- Encouraging the use of virtual meetings whenever possible and space staff six feet apart in group meetings.
- Posting one-way directional signs in hallways and stairways so students walk in the same direction to enter and exit.
- Posting social distancing signs around campuses and offices to remind staff, students and visitors to stay six feet apart.
- When social distancing cannot be achieved, individuals are kept as far apart as possible.

**Face Coverings**

OUHSD provides new face coverings to staff upon request and ensures they are properly worn over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department.
Visitors who refuse to comply with wearing mandatory face coverings are politely asked to leave the site and a phone or virtual appointment will be offered. Masks are provided to staff and students upon request.

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

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
- Employees wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.
- When an employee is executing specific tasks that cannot feasibly be performed with a face covering, and employees are spaced least six feet apart.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19.

**Engineering controls**

The following measures will be implemented for situations where we cannot maintain at least six feet between individuals:

- **Hand sanitizing supplies are provided throughout the building for all staff and visitors.**
- **Plexiglas shields are provided for the front reception area and any other area as requested by employees and/or where close working conditions exist.**

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

- **Setting ventilation systems to bring in 15% of outside air to the interior at all times.**
- **Checking and managing ventilation systems on a regular basis by the Maintenance Department.**
- **Using MERV-13 filters or equivalent in all existing heating and cooling units.**

**Cleaning and disinfecting**

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

- **Custodians have been provided all necessary supplies and clean all occupied areas throughout the district nightly.**
- **Other staff are trained in the proper use of disinfectants to clean frequently touched hard surfaces throughout the day.**

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

- **Immediately clear the room or office of personnel and/or students. Custodians will clean and disinfect the applicable work areas prior to reopening for use.**

**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 staff trained on the use of district-approved disinfectants.

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users. When the sharing of vehicles cannot be avoided, occupants must wear masks and sit as far apart as possible. Windows should be open to maximize air flow.

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

- Provide hand sanitizing stations where soap, water and a hands-free drying method (air dryer or Hands-free paper towels) are not available.
- Encourage and allow time for employee handwashing.
- Provide hand sanitizer that contains at least 70% alcohol. Hand sanitizers that contain methanol (i.e. methyl alcohol) are prohibited.
- Encourage employees to wash their hands for at least 20 seconds.

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

The District evaluates 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.

The District evaluates the need for respiratory protection in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained.

The District provides and ensures 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:

- Provided resources on available COVID testing sites in the area.
- Provided information on sections described in Training and Instruction, and Exclusion of COVID-19 Cases.

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:

- Employees should report possible COVID-19 symptoms to Senior Personnel Technician, Chello Metcalf by calling (530) 538-2300, extension 1117, or by email at cmetcalf@ouhsd.net.
- Employees can report symptoms and hazards without fear of reprisal.
- Accommodation of employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Employees can voluntarily access COVID-19 testing information by contacting Senior Personnel Technician, Chello Metcalf, by calling (530) 538-2300, extension 1117, or by email at cmetcalf@ouhsd.net.
In the event we are required to provide testing due to a workplace exposure or outbreak, contact tracing will be done and any staff member affected will be notified.

Employees shall report COVID-19 symptoms to their supervisor preferably by telephone, and if not possible by, email or text.

Employees may report symptoms and hazards without fear of reprisal. If the employee feels they have been retaliated against they should report the incident to the Human Resources department.

Any employee with medical or other conditions that put them at increased risk of severe COVID-19 illness will have an interactive process meeting with the Senior Personnel Technician to determine if accommodations can be made. The employee is required to provide medical documentation of their limitations. In the event that accommodations cannot be made, the employee may work from home if possible as determined by administration. If not possible, the employee may request a leave of absence.

COVID-19 testing is not required, but strongly recommended, every two months or if the employee suspects they have been exposed or if they have symptoms. All staff who have tested positive for COVID-19 but are asymptomatic are required to quarantine for ten days.

Voluntary COVID-19 testing facilitated by the District is done at no cost to staff member.

A COVID-19 Information page is provided on the District website that provides the following:

- Dashboard
- Daily Wellness Checklist
- Local Testing Locations
- What to do if You’ve been Exposed Information
- COVID-19 Prevention Information
- BCPH Health Resources
- BCPH Vaccine Information
- CDC COVID-19 Virus Information Video
- Forms

Training and Instruction

OUHSD has provided 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, or bargaining unit MOU’s.
- Facts regarding COVID-19:
  - 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
If we have a COVID-19 case in our workplace, we will limit transmission by:

- Excluding staff who test positive for COVID-19 from the workplace until return-to-work requirements are met.
- Excluding staff who have been exposed to COVID-19 from the workplace for 10 days after the last known exposure to a COVID-19 case.
- Continuing and maintaining an employee’s earnings, seniority, and all other employee rights and benefits whenever it is determined 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 on positive COVID-19 cases at our workplace to the local health department whenever required by law as well as 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.

Return-to-Work Criteria

- Staff who test positive for COVID-19 and are experiencing symptoms will not return to work until all the following have occurred:
  - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
  - At least 10 days have passed since COVID-19 symptoms first appeared.
- Staff who tested positive for COVID-19 but are not experiencing 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 employee is ordered to isolate or quarantine 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 of isolation or quarantine was specified, the period will be 10 days from the date the order to isolate was effective, or 10 days from the time the order to quarantine was effective.
**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, 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, students, parents/guardians, members of the public, 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:**

**Date:**

**Name(s) of employee and authorized employee representative that participated:**

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

Date:

Name of person conducting the inspection:

Work location evaluated:

<table>
<thead>
<tr>
<th>Exposure Controls</th>
<th>Status</th>
<th>Person Assigned to Correct</th>
<th>Date Corrected</th>
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<tbody>
<tr>
<td><strong>Engineering</strong></td>
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<tr>
<td>Barriers/partitions</td>
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<tr>
<td>Ventilation (amount of fresh air and filtration maximized)</td>
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<tr>
<td>Additional room air filtration</td>
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<tr>
<td><strong>Administrative</strong></td>
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<tr>
<td>Physical distancing</td>
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<tr>
<td>Surface cleaning and disinfection (frequently enough and adequate supplies)</td>
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<td>Hand washing facilities (adequate numbers and supplies)</td>
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<tr>
<td>Disinfecting and hand sanitizing solutions being used according to manufacturer instructions</td>
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<tr>
<td><strong>PPE (not shared, available and being worn)</strong></td>
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<td>Face coverings (cleaned sufficiently often)</td>
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<tr>
<td>Gloves</td>
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<tr>
<td>Face shields/goggles</td>
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<td>Respiratory protection</td>
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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 the District 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:

Name of person conducting the investigation:

<table>
<thead>
<tr>
<th>COVID-19 Case Investigation Information</th>
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<tbody>
<tr>
<td>Employee (or non-employee*) name:</td>
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<tr>
<td>Location where employee worked (or non-employee was present in the workplace):</td>
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<td>Was COVID-19 test offered?</td>
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<tr>
<td>Date and time the COVID-19 case was last present in the workplace:</td>
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<td>Date the case first had one or more COVID-19 symptoms:</td>
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<tr>
<td>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):</td>
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</tbody>
</table>
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:

<table>
<thead>
<tr>
<th>All employees who may have had COVID-19 exposure and their authorized representatives.</th>
<th>Date:</th>
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<tr>
<td>Names of employees that were notified:</td>
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<tr>
<th>Independent contractors and other employers present at the workplace during the high-risk exposure period.</th>
<th>Date:</th>
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<tr>
<td>Names of individuals that were notified:</td>
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<thead>
<tr>
<th>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</th>
<th>What could be done to reduce exposure to COVID-19?</th>
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<tr>
<th>Was local health department notified?</th>
<th>Date:</th>
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*Should an employer be made aware of a non-employee infection source COVID-19 status.*
**Appendix D: COVID-19 Training Roster**

**Date:**

Person that conducted the training:

<table>
<thead>
<tr>
<th>Employee Name</th>
<th>Signature</th>
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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 an 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:
  - Any employee exposed in the workplace will be tested immediately and again one week later. Negative test results 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, employees who remain at the workplace will be tested 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 that employees who tested positive for COVID-19 or were exposed to COVID-19 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.

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 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 that employees who tested positive for COVID-19 or were exposed to COVID-19 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.