

Model COVID-19 Prevention Program (CPP)

With some exceptions, all employers and places of employment are required to establish and implement an effective written COVID-19 Prevention Program (CPP) pursuant to an Emergency Temporary Standard in place for COVID-19 (California Code of Regulations (CCR), Title 8, section 3205(c)). Cal/OSHA has developed this model program to assist employers with creating their own unique CPP tailored to their workplace.

Employers are not required to use this program. Employers may create their own program or use another CCP template. Employers can also create a written CCP by incorporating elements of this program into their existing Injury and Illness Prevention Program (IIPP), if desired. Cal/OHA encourages employers to engage with employees in the design, implementation and evolution of their COVID-19 Prevention Program.

Using this model alone does not ensure compliance with the emergency temporary standard. To use this model program effectively, the person(s) responsible for implementing the CPP should carefully review:

- All of the elements that may be required in the following CCR, Title 8 sections:
 - 3205, COVID-19 Prevention
 - 3205.1, Multiple COVID-19 Infection and COVID-19 Outbreaks
 - 3205.2, Major COVID-19 Outbreaks
 - 3205.3, Prevention in Employer-Provided Housing
 - 3205.4, COVID-19 Prevention in Employer-Provided Transportation to and from Work
 - The four **Additional Considerations** provided at the end of this program to see if they are applicable to your workplace.
- The additional guidance materials available at www.dir.ca.gov/dosh/coronavirus/



November 2020

COVID-19 Prevention Program (CPP) for Solano Community College District

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

Date: February 3, 2021

Authority and Responsibility

The Human Resources Director 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.
- 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 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 authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards. Facilities Staff work in every area, inside and out, of the campus and report COVID-19 hazards at daily meetings. The college also currently has constituted a Coronavirus task force, that task force has members from every employee group on campus. They meet on a regular basis. In those meetings the employee groups share any concerns they may have with the task force leadership, that in turn share those concerns with the executive group.

Employee screening

We screen our employees by: Most employees are currently working in a remote environment, and are not regularly working on campus. If employee wishes to access campus they must follow the request to access campus procedure as listed below:

SCC Access to Campus Procedure

The District will provide controlled access to faculty offices, classrooms, instructional labs, and workstations to allow employees **essential** work-related access, when approved. Employees coming on campus shall request access in advance, with a minimum notice of two business days, and are subject to approval by the appropriate administrator, in order to ensure social distancing and facilities sanitation in compliance with CDC guidelines. Employees shall maintain social distancing and must wear a face covering at all times when on campus.

Steps 1 through 3 are to be followed by the employee requesting access to the campus:

Step 1: To request access to the campus, employees must complete the “Request to Access Campus” form available on the HR website under forms, COVID-19 forms.

Step 2: Complete the form with all requested information.

Step 3: Click submit at the bottom of the form the form will be sent to HR who will forward to the appropriate VP.

Step 4: HR will notify the employee by district email within one business day if the request to come campus has been approved.

*This form will allow the employee permission to come to the campus. This permission is for the **employee only**; no family members, friends or students may accompany the employee. The campus is current prohibiting access to all members of the public.*

Before access is granted the employee must acknowledge that they have met the aforementioned criteria.

A new form must be completed every time an employee wishes to access the campus.

Employee’s that may be working on campus regularly, are required to submit to daily health checks, acknowledging they have no symptoms and they have not been exposed to anyone with symptoms. These health checks are completed electronically, allowing for proper social distancing.

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented and corrected in a timely manner based on the severity of the hazards, as follows:

Hazards are reported daily at staff meetings and are immediately identified and corrected.

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:

Some desks and tables were removed from the break room to enable 6 feet physical distancing. Masks are required to be worn at all times. Capacity was limited to 4 persons maximum. Break rooms are for computer use only and are off limits for lunch and coffee breaks when masks could not be worn. Lunch may be taken outdoors with appropriate physical distances, in the Faculty/Staff Lounge, or back of Cafeteria with one person per table and maximum physical distancing, 6 feet or more.

Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, 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. Personal face coverings may be supplied by staff, however single use and reusable face coverings and face shields are provided at no cost by the College. Face coverings must be worn at all times when indoors and outdoors when physical distancing of 6' is not possible. Masks must be immediately available but need not be worn while operating equipment such as mowers and tractors.

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.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at 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

We implement the following measures for situations where we cannot maintain at least six feet between individuals: Facilities will provide continual filter changes and services on HVAC system and use of MERV 8 rated filters and higher when possible.

Cleaning and disinfecting

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

- All restrooms are cleaned with a hospital grade disinfectant which is EPA approved for COVID-19.
- Touch points such as door handles, light switches etc., are treated with disinfectant throughout the day by custodial staff.
- Classrooms are provided disinfectant and wipes for additional treatments as needed by instructors.
- Instructors or office personnel may request supplies as needed and will be provided by Facilities.
- Vehicles are assigned to individuals for the most part, however, our mechanic disinfects vehicles on a regular basis with an electrostatic fogger.

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

- Our Custodial staff has received training in COVID-19 techniques.
- In the event of a COVID-19 case in the workplace, the affected area will be cleaned and disinfected by our Custodial staff.

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 facilities staff to meet the current OSHA standards.

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

Hand sanitizing

In order to implement effective hand sanitizing procedures, we have installed abundant numbers of hand sanitizers throughout the District in classrooms, breakrooms, hallways, etc. In addition to these, we have also provided hand sanitizers to outdoor areas such as ballfields and tennis courts. CDC signage is installed in all restrooms and break areas describing proper hand washing protocol.

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. All necessary PPE is provided to staff as needed. This includes gloves, masks (disposable, reusable and N95), face shields and goggles. Tyvek suits are provided to Facilities staff when required. Boxes of PPE items are supplied to instructors for each class.

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.

We provide and ensure 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. [Delete if not applicable to your workplace.]

Investigating and Responding to COVID-19 Cases

Employees who had potential COVID-19 exposure in our workplace will be:

- All employees are covered under a group health plan, and may receive free testing from the doctor. The district will allow employees to go to their doctor's office for testing on work time.
- The district is also in the process of purchasing a rapid PCR saliva testing machine. This would allow for fast testing on the main campus site in Fairfield. Employee's would then have access to testing at the work site and results would be available within 20-30 minutes. This would be at no cost to the employees.
- All employees are required to complete online COVID training videos that meet the current OSHA standards for training. If an employee has not completed this training they will not be allowed access to any worksites.
- Most employees are covered under bargaining unit contracts, and all benefits that are granted to employees are listed in these contracts. The district also sends out year notifications to employees about all benefits that are granted to them. That notification includes information on FFCRA, FMLA, CFRA, medical benefits and references to the union contracts.
- Additional in situation where employees are exposed, or have tested positive in the communication from the district there is reference to what benefits the employee is eligible for, and how to contact the HR department for additional information.

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:

- Who employees should report COVID-19 symptoms and possible hazards to, and how. The college has implemented a “Potential Exposure Notification Procedure” please refer to that procedure below:

SCC Potential Exposure Notification Procedure

The following protocol is to be followed when a faculty or staff member identifies an individual that is exhibiting signs/symptoms, has been exposed to someone confirmed to have COVID-19 or an individual discloses that they are or may be experiencing COVID-19 signs/symptoms.

According to the Centers for Disease Control (CDC), individuals with COVID-19 can exhibit a wide range of signs/symptoms ranging from mild to severe illness. Signs/Symptoms may appear **2-14 days after exposure to the virus**. Common COVID-19 symptoms include: Fever or chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, loss of taste or smell, sore throat, congestion or runny nose, nausea or vomiting, diarrhea.

What to do if an individual on campus exhibits symptoms?

Whether it is an employee or a student, any individual on district property that is sick or exhibiting signs/symptoms of COVID-19 should be sent home.

The following steps are to be followed if an individual discloses to a faculty or staff member that they are experiencing signs/symptoms or may have been exposed to someone who tested positive for COVID-19.

INITIAL NOTIFICATION

Steps 1 through 4 are to be followed by the faculty or staff member that receives the notification from an individual.

College representative who has been told by an individual that he/she is experiencing symptoms of COVID-19, tested positive for COVID-19 or has been exposed to someone who tested positive for COVID-19:

Step 1: Thank the individual for coming forward and notifying you. If they are on campus at the time of notification, inform them that they must go home. If an individual must wait for transportation, they are to wait outside the building, and physically distance (at least 6 feet) from others.

Step 2: Let them know that a COVID Case Worker will be contacting them by the end of the day for follow-up. Get a contact phone number or email so the COVID Case Worker may follow up. For students this contact information will come via the Health Screening Alert Form. Please CC the dean or manager of the area on the email that is sent to the COVID caseworker.

Please note: Legal counsel has advised us that under no circumstances should faculty, administrators, or staff disclose the name of a student or another employee who has self-diagnosed or has a confirmed case of COVID-19 to other students, and disclosure should be on a need to know basis with respect to sharing with college or district employees.

Step 3: If the individual notified you in person (face-to-face), inform your supervisor, leave the campus and do not take part in any on campus work until informed by the COVID County Public Health Liaison notifies you it is safe to return on campus.
If you are notified over the phone or by email this step is not necessary.

Step 4: Document the activity that took place during Steps 1 through 3. All employee potential exposures should be sent via email by the respective supervisor to covidcaseworker@solano.edu. The email subject line should have the below format:

Bargaining unit of the employee (e.g. CSEA, Local 39, etc.), last name of the employee, first name of the employee.

All student Health Screening Alert forms should be sent by faculty to their respective dean. The dean will forward the health screening alerts to covidcaseworker@solano.edu. The email subject line should have the below format:

School (e.g. nursing, Autotech, etc.) last name of the student, first name of the student.

A member of the COVID team will follow up with student or employee, within 24 business hours of receiving the information, to complete the contact tracing.

COVID CASE WORKER FOLLOW-UP

Steps 5 through 9 are to be followed by the COVID Case Worker who has been notified of the potential exposure.

For Students:

Step 5a:

The COVID Case Worker will follow up with the individual based on the Health Screening Alert results, within 24 business hours of receiving the information.

- A. Confirm individual's identification (via Banner, etc.)
- B. Confirm contact information (email and phone number)
- C. Ask the student the following questions:
 - d. What date was your positive test, were you presumed positive by your health care provider or did you begin to show signs/symptoms? Or, when were you exposed to someone who is positive?
 - e. When was the last time you were on campus?
 - f. What buildings on campus did you enter?
 - g. What other students or employees did you come into contact with when you were last on campus?

Close contact is defined by the Centers for Disease Control (CDC), as being within 6 feet of someone with the virus for a cumulative total of 15 minutes (or more) over a 24-hour period.

The COVID Case Worker will advise the Dean of the area where there was a potential student exposure, positive test or symptoms of the date the student may return to on campus activities, including but not limited to clinical rotations, internship or any other activity related to the college. The Dean will then notify the faculty and student of when they may return.

For Employees:

Step 5b: The COVID Case Worker will follow up with the individual who is showing symptoms/signs of COVID-19, or has been potentially exposed to COVID-19 and ask the following questions:

- A. Confirm individual's identification (Via Banner, etc.)
- B. Confirm contact information (email and phone number)
- C. Ask the employee the following questions:
 - d. What date was your positive test, were you were presumed positive by your health care provider or did you begin to show signs/symptoms? Or, when were you exposed to someone who is positive?
 - e. When was the last time you were on campus?
 - f. What buildings on campus did you enter?
 - g. What other students or employees did you come into contact with when you were last on campus?

Close contact is defined by the Centers for Disease Control (CDC), as being within 6 feet of someone with the virus for a cumulative total of 15 minutes (or more) over a 24-hour period.

The COVID Case Worker will advise the employee and the immediate supervisors of the date the employee may return to on campus work. The employee will work with their immediate supervisor to see if remote working is an option.

The student and employee are to keep the COVID Case Worker informed of their status as they go through the remote period and/or recover from their symptoms.

Step 6: The COVID Case Worker will document all communication with all employees and students potentially exposed COVID.

Step 7: The COVID Case Worker will then notify the Superintendent/President, the appropriate Vice President, and the Facilities Director.

Step 8: The COVID Case Worker will notify anyone who may have been potentially exposed by coming into contact with the potentially infected person. Under HIPPA regulation the name of the person who is presumed positive will not be shared with any other employee or student.

Step 9: Document the activity that took place during Steps 5 through 8.

- The Potential Exposure Notification Procedure is posted on the college webpage and is accessible to all employees at any time.
- 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.
- Employee's who wish to get voluntary tested may do so by working with their health care provider, or access the public health department at the following link: [LHI.care/covidtesting](https://lhi.care/covidtesting) .
- 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. Currently the district is in the process of purchasing a PCR saliva testing machine. That will make testing available to all employee on the main campus in Fairfield in a timely manner.
- 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.

Training and Instruction

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
 - COVID-19 is an infectious disease that can be spread through the air.
 - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
 - An infectious person may have no symptoms.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- As the districts training is completed electronically, all training roster records are kept in an electronic format.
- All Employees and students will be required to complete COVID-19 training in advance of participating in any in-person activities related to the college.

Appendix A: COVID-19 Training Roster are maintained by the district in electronic format and are available for review by contacting the Human Resources department.

Exclusion of COVID-19 Cases

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 10 days after the last known

COVID-19 exposure to a COVID-19 case.

- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished by adhering to all current bargaining contracts and current federal and state laws that govern employee granted leaves and rights.
- 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 health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.
- Most employees of the district are in a remote working environment and are not required to come to their physical work locations.

Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
 - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
 - COVID-19 symptoms have improved.
 - At least 10 days have passed since COVID-19 symptoms first appeared.
 - COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
 - A negative COVID-19 test will not be required for an employee to return to work.
 - If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.
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Appendix A: COVID-19 Training Roster

All district training rosters are maintained in electronic format, and may be accessed upon request to the Human resources department.

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**.

