

COVID-19 Prevention Program (CPP) for the Kings County Office of Education

This CPP is designed to control employees' exposures to the SARS-CoV-2 virus (severe acute respiratory syndrome coronavirus 2) that causes COVID-19 (Coronavirus Disease 2019) that may occur in our workplace.

Date: May 6, 2022

Authority and Responsibility

The Assistant Superintendent of Human Resources 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 implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Document the vaccination status of our employees by using **Appendix E: Documentation of Employee COVID-19 Vaccination Status**, which is maintained as a confidential medical record.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Develop COVID-19 policies and procedures to respond effectively and immediately to individuals at the workplace who are a COVID-19 case to prevent or reduce the risk of transmission in the workplace including our Wellness Precautions Plan:

What we are doing:

- Encouraging and [reminding](#) everyone to wash or sanitize their hands often
- Routinely sanitizing/disinfecting high-touch surfaces with additional deep cleaning as needed
- Supporting physical distancing of workstations as practicable
- Implementing individual control measures and daily health screenings for all staff ([self-certification form](#)). See also CDC's [Self Checker](#)
- Requiring/reminding people to stay home if they feel unwell
- Providing generous sick leave policies to support recovery and prevent the spread of germs
- Implementing and following [Cal/OSHA](#) and [CDPH Guidance for Use of Face Coverings](#) for the use of face coverings.
- Staff who have not provided proof that they are fully vaccinated are required to participate in weekly surveillance testing
- Trainings(Zoom, Google, Keenan, etc...) [Antimicrobial Pesticides Training](#), [Cal/OSHA COVID-19 Protection Plan Training](#)
- Continued closure of building to general public
- Essential visitors by appointment with precautions
- [Wellness Screening Checklist for essential visitors](#) prior to entry
- Continuous review of all relevant [Public Health recommendations and guidelines](#)
- Providing personal protective equipment such as face coverings, KN95 respirators, gloves, hand sanitizer to staff as needed/requested
- Limit the need for employees to share phones, desks, and other equipment
- Consideration and review of physical spaces including assigned work stations and areas that allow for more space between work stations
- Design and control internal traffic patterns, limit work areas to those staff assigned to the area whenever possible
- Provide resources for additional cleaning, sanitization, and protective measures
- Conduct Interactive Process Meetings with any staff who have special needs and require accommodations
- Reviewing and considering ventilation options - encouraging open doors/windows when possible

- Providing weekly PCR surveillance testing for all staff (required for those who have not submitted verification that they are fully vaccinated)
- Rapid Antigen Testing available for all staff and students as needed
- Home antigen testing offered for staff and students to use prior to return from extended school breaks

What we are asking staff to do:

- Wash or sanitize hands often – wash upon arrival at work and prior to leaving (check out hand sanitizer for your work station from department head)
- Wipe down your personal work space regularly –at least upon arrival/departure daily (after you have completed training)
- Implement physical distancing as much as practicable
- Do not enter other work areas, spaces, or offices unless necessary
- Avoid direct physical contact such as shaking hands
- Carry your own pen etc...with you instead of borrowing from others
- Take breaks outdoors or individually if you use the break room or other common areas, wipe down the area you occupied with sanitizer prior to leaving it
- Consider video conferencing, email, or phone communications as a means of meeting instead of person when practicable
- Practice your daily wellness screening, Stay home and self-report any signs or symptoms of COVID immediately to our HR COVID Technician, Liz Ibarra (liz.ibarra@kingscoe.org or 559-589-7064) or a secondary contact tracer
- Limit your potential exposure outside of work - Notify HR if you become aware that you have been in close contact with someone who is COVID positive
- Inform your manager or HR of any health or safety concerns & share ideas or suggestions
- Be thoughtful and considerate regarding all precautionary measures honor additional reasonable safety measures other staff may request or be implementing for themselves
- Leave doors/windows open when possible to enhance ventilation
- STAY HOME if you are unwell

What we are recommending to staff:

- COVID-19 vaccinations and boosters are readily available. To schedule an appointment visit: www.myturn.ca.gov.

KCOE Designated Contact Tracers:

Liz Ibarra, HR Technician/COVID coordinator – Primary Contact Tracer for all KCOE students and staff
liz.ibarra@kingscoe.org, (559) 589-7064

Lisa Horne, HR Dept. - lisa.horne@kingscoe.org or 589-7094 (cell 362-2485 for after-hours/weekends) or as back up to all other contact tracers

Valerie Misenhimer-Miller, School Nurse – Back up contact tracer for all Shelly Baird School staff members and students valerie.misenhimer@kingscoe.org or 589-7034

Lisa Leonard, School Nurse – Backup contact tracer for all SELPA staff members and other staff who have direct contact with students on a school campus lleonard@kingscoe.org or 589-2634

Julie Gong, School Nurse - Back up support to all of the above and district direct service
jgong@kingscoe.org or 589-2635

If unable to reach or get a timely response from any of our contact tracers, call the HR office at 589-7086 or 589-7081 or the KCOE reception desk at 589-2500 for assistance.

- 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 and evaluate 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 by: submitting a work request, emailing or contacting their direct manager, emailing or contacting their department head, emailing or contacting human resources.

Employee screening

We screen our employees and respond to those with COVID-19 symptoms by: All employees reporting to a KCOE work site are required to consider their current health condition and “self-certify” daily prior to reporting to any work location. If they are exhibiting any signs of illness they are directed to stay home and contact the COVID contact tracer. **Appendix F: Wellness Screening Checklist.**

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures are documented on the **Appendix B: COVID-19 Inspections** form, and corrected in a timely manner based on the severity of the hazards, as follows:

- The severity of the hazard will be assessed, and correction time frames assigned, accordingly.
- Individuals are identified as being responsible for timely correction.
- Follow-up measures are taken to ensure timely correction.

Control of COVID-19 Hazards

Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees where required by orders from the California Department of Public Health (CDPH) and/or CalOSHA.

We will not prevent any employee from wearing a face covering when it is not required unless it would create a safety hazard, such as interfering with the safe operation of equipment.

Face coverings will also be provided to any employee that requests one, regardless of their vaccination status.

Engineering controls

For indoor locations, using Appendix B, we identify and evaluate how to maximize, to the extent feasible, ventilation with outdoor air using the highest filtration efficiency compatible with our existing ventilation system, and whether the use of portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems, would reduce the risk of transmission by:

- Applicable orders and guidance from the State of California and your local health department related to COVID-19 hazards and prevention, including CDPH’s Interim Guidance for Ventilation, Filtration, and Air Quality in Indoor Environments.
- The Kings County Office of Education schedules regular semi-annual maintenance of all HVAC systems for facilities located throughout the county with additional replacement of filters two additional times during the year.
- The HVAC filters used are MERV-13 for a high level of air filtration as recommended to help with COVID-19, staff are also encourage to open doors and windows to help with air circulation during acceptable weather conditions.
- KCOE has distributed Winix portable HEPA filtration units to all classrooms and areas that have a high level of activity to help reduce the risk of COVID-19 transmission.

Cleaning and disinfecting

We implement the following cleaning and disinfection measures for frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, phones, headsets, bathroom surfaces, and steering wheels:

- Ensuring adequate supplies and adequate time for it to be done properly.
- Informing the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection.
- Fogging all classrooms and office spaces each night.
- Training all employees on the safe use of antimicrobial pesticides.

Should we have a COVID-19 case in our workplace, a cleaning of the frequently touched common areas will be done. A disinfecting of the area, material or equipment will be done if it is to be used by another employee within 24 hours of the COVID-19 case.

Hand sanitizing

To implement effective hand sanitizing procedures, we:

- Provide readily accessible handwashing stations/facilities to all employees.
- Encourage, remind, and allow time for employee handwashing.
- Provide employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e., methyl alcohol).
- Encourage and remind employees to wash their hands for at least 20 seconds each 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 section 3380, and provide and ensure use of such PPE as needed.

Upon request, we provide respirators for voluntary use to all employees who request them.

We provide and ensure use of respirators in compliance with section 5144 when deemed necessary by Cal/OSHA.

Testing of symptomatic employees

We make COVID-19 testing available at no cost to all employees in the workplace during employees' paid time.

Investigating and Responding to COVID-19 Cases

We have developed effective procedures to investigate COVID-19 cases that include seeking information from our employees regarding COVID-19 cases, close contacts, test results, and onset of symptoms. This is accomplished by using the **Appendix C: Investigating COVID-19 Cases** form.

We also ensure the following is implemented:

- Employees that had a close contact are offered COVID-19 testing at no cost during their working hours, except for COVID-19 cases who were allowed to return to work per our return-to-work criteria and have remained free of symptoms for 90 days after the initial onset of symptoms, or for cases who never developed symptoms, for 90 days after the first positive test.
- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to these employees.
- Written notice within one business day of our knowledge of a COVID-19 case that people at the worksite may have been exposed to COVID-19. This notice will be provided to all employees (and their authorized representative), independent contractors and other employers on the premises at the same worksite as the COVID-19 case during the high-risk exposure period. These notifications will meet the requirements of T8CCR section 3205(c)(3)(B) and Labor Code section 6409.6(a)(4); (a)(2); and (c).
- We consider a "close contact" that meets the definition as described in section 3205(b)(1) definition; "high-risk exposure period" meets the section 3205(b)(10) definition; and "worksite" meets the section 3205(b)(12) definition]

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, possible close contacts and hazards to, and how.
- That employees can report symptoms, possible close contacts and hazards without fear of reprisal.
- How employees with medical or other conditions that put them at increased risk of severe COVID-19 illness can request accommodations by contacting the assistant superintendent of human resources to schedule an interactive process meeting.

- Access to COVID-19 testing when testing is required or desired on site during regular work hours.
- The 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 provide effective employee training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards, and how to participate in the identification and evaluation of COVID-19 hazards.
- Information regarding COVID-19-related benefits (including mandated sick and vaccination leave) 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.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing, face coverings, increased ventilation indoors, and respiratory protection decrease the spread of COVID-19 and are most effective when used in combination.
- The right of employees that are not fully vaccinated to request a respirator for voluntary use, without fear of retaliation, and our policies for providing the respirators. Employees voluntarily using respirators will be trained according to section 5144(c)(2) requirements:
 - How to properly wear them.
 - How to perform a seal check according to the manufacturer's instructions each time a respirator is worn, and the fact that facial hair can interfere with a seal.
- 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. Since COVID-19 is an airborne disease, N95s and more protective respirators protect the users from airborne disease, while face coverings primarily protect people around the user.
 - The conditions where face coverings must be worn at the workplace.
 - That face coverings are additionally recommended outdoors for people who are not fully vaccinated if six feet of distance cannot be maintained.
 - Employees can request face coverings and can wear them at work regardless of vaccination status and without fear of retaliation.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- Information on our COVID-19 policies and how to access COVID-19 testing and vaccination, and the fact that vaccination is effective at preventing COVID-19, protecting against both transmission and serious illness or death.

COVID-19 Training documentation is maintained in our Keenan Safe Schools System.

Exclusion of COVID-19 Cases and Employees who had a Close Contact

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

- Ensuring that active COVID-19 cases are excluded from the workplace until return-to-work requirements are met.
- Excluding employees that had a close contact from the workplace until our return-to-work criteria have been met, with the following exceptions:
 - Employees who do not develop COVID-19 symptoms, provided they wear a face covering and maintain six feet of physical distance from others in the workplace for 10 days following the last date of close contact and test between days 3-5 after the exposure with a negative result.
 - COVID-19 cases who returned to work per our return-to-work criteria and have remained free of

COVID-19 symptoms do not need to be excluded from the workplace for 90 days after the initial onset of COVID-19 symptoms, provided they wear a face covering and maintain six feet of distance from others in the workplace for 10 days following the last date of close contact.

- COVID-19 cases who returned to work per our return-to-work criteria who never developed COVID-19 symptoms do not need to be excluded from the workplace for 90 days after the first positive test, provided they wear a face covering and maintain six feet of distance from others in the workplace for 10 days following the last date of close contact.
- If we do not exclude an employee who had a close contact as permitted by the above three exceptions, we will provide the employee with information about any applicable precautions recommended by CDPH for individuals with close contact.
- For employees excluded from work, continuing, and maintaining employees' earnings, wages, seniority, and all other employees' rights and benefits. This will be accomplished by 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 and outbreaks at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with 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.
- We use a confidential form in our HR Google Drive to keep a record of and track all COVID-19 cases.

Return-to-Work Criteria

- **COVID-19 cases with symptoms** will not return to work until all the following have occurred:
 - At least 24 hours have passed since a fever of 100.4 °F. or higher has resolved without the use of fever-reducing medications, and
 - COVID-19 symptoms have improved, and
 - Either:
 - At least 5 days have passed since COVID-19 symptoms first appeared and they tested with a negative result on day 5 or later, or
 - At least 10 days have passed since COVID-19 symptoms first appeared
- **COVID-19 cases who tested positive but never developed symptoms** will not return to work until:
 - A minimum of 5 days have passed since the date of specimen collection of their first positive COVID-19 test and they tested with a negative result on day 5 or later, or
 - A minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
- Persons who had a close contact may return to work as follows:
 - Close contact but never developed symptoms (regardless of vaccination status) can return to work provided
 - the person wears a face covering and maintains six feet of physical distance from others while at the workplace for 10 days following the last date of close contact.
 - Close contact with symptoms:
 - At least 24 hours have passed since a fever of 100.4 °F. or higher has resolved without the use of fever-reducing medications, and
 - COVID-19 symptoms have improved, and they tested with a negative result.
- If an order to isolate, quarantine, or exclude 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.

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, training, 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 stationary work.

Person conducting the evaluation:

Date:

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

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

Appendix B: COVID-19 Inspections

Date:

Name of person conducting the inspection:

Work location evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Ventilation* (amount of fresh air and filtration maximized)			
Additional room air filtration*			
Administrative			
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			
PPE			
Not shared, available and being worn as required			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Respiratory protection			
*Identify and evaluate how to maximize ventilation with outdoor air; the highest level of filtration efficiency compatible with the existing ventilation system; and whether the use of portable or mounted HEPA filtration units, or other air cleaning systems, would reduce the risk of COVID-19 transmission. Review applicable orders and guidance from the State of California and local health departments related to COVID-19 hazards and prevention have been reviewed, including the CDPH Interim Guidance for Ventilation, Filtrations, and Air Quality in Indoor Environments and information specific to your industry, location, and operations. We maximize the quantity of outside air provided to the extent feasible, except when the United States Environmental Protection Agency (EPA) Air Quality Index is greater than 100 for any pollutant or if opening windows or maximizing outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.			

Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or persons with COVID-19 symptoms, and any employee required medical records will be kept confidential unless disclosure is required or permitted by law. Un-redacted information on COVID-19 cases will be provided to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH) immediately upon request, and when required by law. Information collected/provided includes:

- Date
- Name of person conducting the investigation
- Name of COVID-19 case (employee or non-employee*) and contact information
- Occupation (if non-employee*, why they were in the workplace)
- *If we are made aware of a non-employee COVID-19 case in our workplace
- Names of employees/representatives involved in the investigation
- Date investigation was initiated
- Locations where the COVID-19 case was present in the workplace during the high-risk exposure period, and activities being performed
- Date and time the COVID-19 case was last present and excluded from the workplace
- Date of the positive or negative test and/or diagnosis
- Date the case first had one or more COVID-19 symptoms, if any
- Information received regarding COVID-19 test results and onset of symptoms
- Summary determination of who may have had a close contact with the COVID-19 case during the high-risk exposure period. Attach additional information, including:
 - The names of those found to be in close contact.
 - Their vaccination status.
 - When testing was offered, including the results and the names of those that were exempt from testing because:
 - They returned to work per our return-to-work criteria and have remained symptom free for 90 days (or a different period than 90 days if it is required by a CDPH regulation or order) or, for those that never developed symptoms, for 90 days (or a different period than 90 days if it is required by a CDPH regulation or order) after the initial positive test.
 - The names of those close contacts that were excluded per our Exclusion of COVID-19 Cases and Employees who had Close Contact requirements.
 - The names of those close contacts exempt from exclusion requirements because:
 - They did not develop COVID-19 symptoms, and are required to wear a face covering and maintain six feet of distance from others at the workplace for 10 days following the last date of close contact.
 - They returned to work per our return-to-work criteria and have remained symptom free, and are required to wear a face covering and maintain six feet of physical distance from others at the workplace for 10 days following the last date of close contact.

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:

1. All employees who were on the premises at the same worksite as the COVID-19 case during the high-risk exposure period
2. Their authorized representatives (KTA and CSEA bargaining units)

Names of employees that were notified:	Names of their authorized representatives:	Date

Independent contractors and other employers on the premises at the same worksite as the COVID-19 case during the high-risk exposure period.

Names and Organization/Business of individuals that were notified:	Date

Records of this information are maintained in the human resources department.

Appendix D: COVID-19 Training Roster

Maintained in our Keenan Safe Schools On-line Program

Appendix E: Documentation of Employee COVID-19 Vaccination Status - CONFIDENTIAL

Maintained in our Human Resources Department

Appendix F: Employee and Essential Visitor Wellness Checklist

Wellness Screening Checklist

All employees reporting to a KCOE work site are required to consider their current health condition and “self-certify” prior to reporting to any work location.

Please review, sign, and submit this form to your manager or HR (one time only). Keep a copy at home to remind you to **self-check DAILY** and immediately notify your manager or HR should your situation change from the initial submission.

1. Have you had a fever (100.4 degrees Fahrenheit) or chills within the last 48 hours?

☐ Yes ☐ No

2. Do you have any of the following symptoms? New or Worsening Cough, Shortness of Breath, Runny Nose, Sore Throat, Loss of Taste or Smell, Vomiting, Diarrhea

☐ Yes ☐ No

3. Are you aware of recent* close contact with a COVID+ person?** ☐ Yes ☐ No

*Recent – within the last 14 days starting from 2 days prior to when the person began feeling unwell

** Close Contact - Within 6 feet for 15 minutes or more without facial coverings

If you answered ‘NO’ #1 and 3, you can report to work. Please continue following precautions:

- Wash your hands and/or use alcohol-based sanitizer frequently throughout the day.
- Practice social distancing, sit and/or stand at least 6 feet from other people. Wear a cloth face covering.
- Do not shake hands or hug people. Do not share personal equipment such as pens or food/drinks.
- Avoid touching your eyes, nose and mouth.
- Sanitize your personal work area upon arrival and/or before you leave each day.
- Practice good respiratory etiquette (cover your cough and sneezes with a tissue).
- Contact your manager and leave work immediately if you start to feel feverish or ill.
- Limit potential for exposure outside of work – notify HR if you become aware that you have been exposed to COVID-19.

4. If you have a fever and/or symptoms of illness: Stay home and contact your manager and HR.

5. If you have a pre-existing condition with COVID similar symptoms:

- If your symptoms are 'normal' and consistent with your established condition (such as allergies or asthma) and they have not worsened compared to your baseline, then you can continue to work following all precautions.
- **If your symptoms are new or worsened, stay home and contact your manager.**

As always, please seek the advice of your physician for all medical concerns or questions. ***I agree to continue self-screening daily and to notify my supervisor immediately should I experience any change.***

Name: _____ **Date:** _____

Signature: _____

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

An outbreak is 3 or more employee COVID-19 cases within an exposed group visited the workplace during their high-risk exposure period at any time during a 14-day period.

This addendum will stay in effect until there are no new COVID-19 cases detected in the exposed group for a 14-day period.

COVID-19 testing

We provide COVID-19 testing at no cost to all employees, during paid time, in our exposed group except for:

- Employees who were not present during the relevant 14-day period.
- COVID-19 cases who did not develop symptoms after returning to work pursuant to our return-to-work criteria, no testing is required for 90 days after the initial onset of symptoms or, for COVID-19 cases who never developed symptoms, 90 days after the first positive test.

COVID-19 testing consists of the following:

- All employees in our exposed group are immediately tested and then again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine, isolation, or exclusion period required by, or orders issued by, the local health department.
- After the first two COVID-19 tests, we continue to provide COVID-19 testing once a week of employees in the exposed group who remain at the workplace, 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 provide additional testing when deemed necessary by Cal/OSHA.

We continue to comply with the applicable elements of our CPP, as well as the following:

1. Employees in the exposed group wear face coverings when indoors, or when outdoors and less than six feet apart (unless one of the face-covering exceptions indicated in our CPP apply).
2. We give notice to employees in the exposed group of their right to request a respirator for voluntary use if they are not fully vaccinated.
3. We evaluate whether to implement physical distancing of at least six feet between persons, or where six feet of physical distancing is not feasible, the need for use of cleanable solid partitions of sufficient size to reduce COVID-19 transmission.

COVID-19 investigation, review, and hazard correction

We 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 is documented and includes:

- 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 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 feasible.
 - Requiring respiratory protection in compliance with section 5144.

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, 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, if so, implement their use to the degree feasible.

Additional Consideration #2

Major COVID-19 Outbreaks

A major outbreak is 20 or more employee COVID-19 cases in an exposed group visit your workplace during the high-risk exposure period within a 30-day period.

This addendum will stay in effect until there are fewer than three COVID-19 cases detected in our exposed group for a 14-day period.

We continue to comply with the Multiple COVID-19 Infections and COVID-19 Outbreaks addendum, except that the COVID-19 testing, regardless of vaccination status, is made available to all employees in the exposed group twice a week, or more frequently if recommended by the local health department.

In addition to complying with our CPP and Multiple COVID-19 Infections and COVID-19 Outbreaks addendum, we also:

- Provide employees in the exposed group with respirators for voluntary use in compliance with section 5144(c)(2) and determine the need for a respiratory protection program or changes to an existing respiratory protection program under section 5144 to address COVID-19 hazards.
- Separate by six feet (except where we can demonstrate that six feet of separation is not feasible and there is momentary exposure while persons are in movement) any employees in the exposed group who are not wearing respirators required by us and used in compliance with section 5144. When it is not feasible to maintain a distance of at least six feet, individuals are as far apart as feasible such as physical distancing that includes: telework or other remote work arrangements; 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; and adjusted work processes or procedures to allow greater distance between employees.
- Install cleanable solid partitions that effectively reduce transmission between the employee and other persons at workstations where an employee in the exposed group is assigned to work for an extended period, such as cash registers, desks, and production line stations, and where the physical distancing requirement (described above) is not always maintained.
- Evaluate whether to halt some or all operations at the workplace until COVID-19 hazards have been corrected.
- Implement any other control measures deemed necessary by Cal/OSHA.