



# COVID-19 Prevention Program (CPP) for San Mateo County Office of Education (SMCOE)

January 2021

## PURPOSE

The purpose of SMCOE's COVID-19 Prevention Program ("CPP") is to provide a healthy and safe workplace as required under the California Occupational Safety and Health Act (Labor Code §§ 6300, et seq.) and associated regulations (8 C.C.R. § 3205).

Nothing in this CPP precludes SMCOE from complying with federal, state, or local laws or guidance that recommends or requires measures that are more prescriptive and/or restrictive than are provided herein.

## SCOPE

This CPP applies to all SMCOE employees except for those employees who are exclusively working remotely or subject to the Aerosol Transmissible Diseases ("ATD") program.

## DEFINITIONS

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

"COVID-19" means coronavirus disease, an infectious disease caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).

"COVID-19 case" means a person who either: (1) Has a positive "COVID-19 test" as defined in this section; (2) Is subject to COVID-19-related order to isolate issued by a local or state health official; or (3) Has died due to COVID-19, in the determination of a local health department or per inclusion in the COVID-19 statistics of a county. A person is no longer a "COVID-19 case" when a licensed health care professional determines that the person does not have COVID-19, in accordance with recommendations made by the California Department of Public Health (CDPH) or the local health department pursuant to authority granted under the Health and Safety Code or title 17, California Code of Regulations to CDPH or the local health department.

"Close contact COVID-19 exposure" means being within six (6) feet of a COVID-19 case for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the "high-risk exposure period" as defined here. This definition applies regardless of the use of face coverings.

"COVID-19 hazard" means exposure to potentially infectious material that may contain SARS-CoV-2, the virus that causes COVID-19. Potentially infectious materials include airborne droplets, small particle aerosols, and airborne droplet nuclei, which most commonly result from a person or persons exhaling, talking or vocalizing, coughing, sneezing, or procedures performed on persons which may aerosolize saliva or respiratory tract fluids, among other things. This also includes objects or surfaces that may be contaminated with SARS-CoV-2.

"COVID-19 symptoms" means one of the following: (1) fever of 100.4 degrees Fahrenheit or higher or chills;

(2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches; (6) headache; (7) new loss of taste or smell; (8) sore throat; (9) congestion or runny nose; (10) nausea or vomiting; or (11) diarrhea, unless a licensed health care professional determines the person's symptoms were caused by a known condition other than COVID-19.

“COVID-19 test” means a viral test for SARS-CoV-2 that is both: (1) Approved by the United States Food and Drug Administration (FDA) or has an Emergency Use Authorization from the FDA to diagnose current infection with the SARS-CoV-2 virus; and (2) Administered in accordance with the FDA approval or the FDA Emergency Use Authorization as applicable.

“Exposed workplace” means any work location, working area, or common area at work used or accessed by a COVID-19 case during the high-risk period, including bathrooms, walkways, hallways, aisles, break or eating areas, and waiting areas. This can also include an offsite field location.

The exposed workplace does not include buildings or facilities not entered by a COVID-19 case. Effective January 1, 2021, the “exposed workplace” also includes but is not limited to the “worksite” of the COVID-19 case as defined by Labor Code section 6409.6(d)(5).

“Face covering” means a tightly woven fabric or non-woven material with no visible holes or openings, which covers the nose and mouth.

“High-risk exposure period” means the following time period: (1) For persons who develop COVID-19 symptoms: from two (2) days before they first develop symptoms until ten (10) days after symptoms first appeared, and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved; or (2) For persons who test positive who never develop COVID-19 symptoms: from two (2) days before until ten (10) days after the specimen for their first positive test for COVID-19 was collected.

## **Authority and Responsibility**

Nancy Magee, San Mateo County Superintendent of Schools, 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 have implemented the following in our workplace:

- SMCOE's [Return to Campus Plan for SMCOE School Programs](#) serves as our schools' Safe Reopening Plan.
- Workplace-specific evaluations.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace as they occur.
- Review of applicable orders, general and industry-specific guidance from the Centers for Disease Control and Prevention, State of California, Cal/OSHA, the San Mateo County Office of Education, and the County of San Mateo Public Health related to COVID-19 hazards and prevention.

- Existing COVID-19 prevention controls in our workplace and we will evaluate the need for different or additional controls, as the need arises.
- 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.
- Create and post a [Facilities Walkthrough Checklist](#) on the SMCOE website.

## **Employee participation**

Employees and their authorized employee representatives are encouraged to continue to participate in the identification and evaluation of COVID-19 hazards.

## **Employee screening**

We screen our employees for COVID-19 symptoms prior to entering SMCOE worksites and facilities.

## **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.

## **Control of COVID-19 Hazards**

### **Physical Distancing**

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

SMCOE specific workplace methods include:

- Reducing the number of persons in an area at one time.
- Prohibiting visitors to SMCOE sites unless for safety reasons, such as fire sprinkler inspections.
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.
- Often conduct meetings remotely even if people are in the facility.
- Each school site has specific ingress and egress routes to maintain physical distancing.
- When moving about the campuses, students remain six feet apart, unless unable to do so due to their disability.

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

### **Face Coverings**

We provide face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, 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 San Mateo County Health. Employees are encouraged to contact their supervisor if they need additional face coverings or have any other concerns.

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.
- Persons younger than two years old; anyone who has trouble breathing.
- Persons who are otherwise unable to remove the face covering without assistance.
- Persons who are obtaining a service involving the nose or face for which temporary removal of the face covering is necessary to perform the service.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any approved 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. Testing cannot be used in place of a face covering requirement for a non-approved reason. The twice weekly testing mentioned in this paragraph is not on SMCOE time or reimbursable by SMCOE.

## **Engineering controls**

We continue to implement the following measures for situations where we cannot maintain at least six feet between individuals: Develop cohort shifts to maintain office social distancing protocols, allow remote working where possible, or reconfigure space if necessary.

We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems. SMCOE takes all reasonable precautions to prevent the distribution of unhealthy air circulating through SMCOE facility air distribution systems. These precautions include:

- performing regular preventive maintenance and filter changes
- exclusively using high efficiency air filters
- maximizing outside fresh air intake in the operation of our buildings' air distribution systems wherever possible (weather permitting)
- continuing to perform extensive mechanical engineering analysis of existing HVAC systems.

## **Cleaning and disinfecting**

We continue to implement the CDPH and San Mateo County Pandemic Recovery Framework cleaning and disinfection measures for frequently touched surfaces as outlined in our School Reopening Plan including:

- Place hand sanitizer dispensers in lobbies/common areas
- Prop doors open to reduce touching of handles as appropriate
- Provide disinfectant wipes in appropriate locations; post signage advising occupants to sanitize touch surfaces before and after each use
- Inform the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection.
- Ensure adequate supplies and time for the cleaning to be done properly.

It is a priority that SMCOE facilities, the workplace, and SMCOE vehicles are maintained at the highest standard of cleanliness. SMCOE has directed the custodial staff to 1) conduct more frequent cleanings throughout the day in public spaces and common areas, as well as 2) use EPA-approved germicide/disinfectant products to ensure all surfaces and touchpoints in public areas and within the workplace are sanitized. A more detailed cleaning protocol is available from SMCOE upon request. Should we have a COVID-19 case in our workplace, SMCOE will thoroughly clean and disinfect the affected areas.

## **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 providing disinfecting materials for staff and cleaning by the custodial staff as with high touch area cleaning. Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seat belt buckles, armrests, shifter, etc.) will be disinfected between users.

## **Hand sanitizing**

We have implemented effective hand sanitizing procedures by:

- Evaluating hand washing facilities.
- Determining the need for additional facilities.
- Encouraging and allowing time for employee handwashing.
- Making hand sanitizer and hand sanitizer stations available at all sites.
- Encouraging 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 continuously 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.

- Each campus is stocked with masks, gloves, and disinfectant wipes
- School staff are provided with individual hygiene kits that include disinfectant wipes, hand sanitizer, and extra face masks
- Gowns and gloves are provided to staff who support student health procedures

## Investigating and Responding to COVID-19 Cases

Employees who have potential (close contact) COVID-19 exposure in our workplace will be:

- Instructed to remain at or return to their home or place of residence and not return until such time as the employees satisfy the minimum criteria to return to work. Remote work may be available at this time.
- Offered COVID-19 testing at no cost during their working hours.
- Provided with information on benefits continuation.

(This section does not apply to those whose exposure did not occur in the workplace.)

## System for Communicating

Our goal is to ensure that we have effective communication with our employees in a form they can readily access, understand, and includes the following information:

- Employees should report COVID-19 symptoms and possible hazards to their supervisor or Human Resources if they have any concerns. Employees can report symptoms and hazards without fear of retaliation or reprisal.
- Employee representatives should contact Human Resources to identify any hazards or concerns.
- Employees with medical or other conditions that put them at increased risk of severe COVID-19 illness are encouraged to discuss options with Human Resources.
- Where SMCOE does not provide or pay for testing, employees can access COVID-19 testing through their primary healthcare provider or <https://www.smcgov.org/testing>.
- In the event SMCOE is 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.
- SMCOE will notify in-person or by direct phone call those staff identified as close contacts to a person with COVID-19 and provide information on next steps.
- SMCOE will notify all staff who were on site where a person with COVID-19 had been working within 48 hours of their positive test or the onset of symptoms.

COVID-19 policies and procedures will be documented and provided.

## Training and Instruction

We continue to provide effective training and instruction that addresses:

- 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.
- Facts about COVID-19, including:
  - 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.

- 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.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
- 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.
- The importance of limiting any gatherings. No communal food gatherings or sharing.

## **Exclusion of COVID-19 Cases**

### **Exclusion of COVID-19 Cases from SMCOE Worksites and Facilities**

SMCOE will ensure that COVID-19 cases are excluded from the workplace until the individual satisfies the minimum return to work criteria. Remote work may be available during this time.

### **Exclusion of Employees with Close Contact COVID-19 Exposures from SMCOE Worksites and Facilities**

SMCOE will exclude employees with close contact COVID-19 exposure from the workplace for 14 days after the last known close contact COVID-19 exposure. SMCOE and the employee will review options such as remote work during this time, as appropriate.

### **Provision of Benefits to SMCOE Employees Excluded from Work as a Result of a Positive COVID-19 Test or Diagnosis or a Close Contact COVID-19 Exposure**

#### *Employees Who Are Able to Work Remotely During Isolation or Quarantine Period*

SMCOE will allow employees whose role can be accomplished through remote work and who are able and available to work remotely during the isolation or quarantine period. SMCOE will provide these employees their normal compensation for the work they perform for SMCOE during the isolation or quarantine period.

#### *Employees Who Are Unable to Work Remotely During Isolation or Quarantine Period*

The provision of benefits described below does not apply to either: (1) SMCOE employees who SMCOE can demonstrate the close contact COVID-19 exposure was not work-related; and (2) SMCOE employees who are unable to work for reasons other than protecting employees and non-employees at SMCOE worksites and facilities from possible COVID-19 transmission.

For other employees, SMCOE will require that employees whose jobs are not compatible with working remotely, but are otherwise able and available to work, to use paid sick leave in order to receive compensa-

tion during the isolation or quarantine period. SMCOE employees retain their entitlement to elect not to use other earned or accrued paid leave during this time. SMCOE may allow such employees who are unable to work remotely, but who do not have any paid sick leave available, to use other paid leave in order to receive compensation during the isolation or quarantine period.

For all employees who are subject to an isolation or quarantine because of a COVID-19 case or a close contact COVID-19 exposure, SMCOE will maintain the employees' seniority and all other employee rights and benefits, including the employees' right to their former job status, during the isolation or quarantine period.

SMCOE may consider benefit payments from public sources in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers' compensation.

## **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 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.
- 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 is made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

## **Transportation**

### **Cleaning and disinfecting**

We will ensure that:

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

### **Ventilation**

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



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

## **Return-to-Work Criteria**

### **Minimum Criteria to Return to Work for Symptomatic COVID-19 Cases**

- SMCOE requires that COVID-19 cases with COVID-19 symptoms remain at their home or place of residence and not report to any SMCOE worksite or facility until they satisfy each of the following conditions:
  - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications; and
  - COVID-19 symptoms have improved; and
  - At least 10 days have passed since COVID-19 symptoms first appeared.

### **Minimum Criteria to Return to Work for Asymptomatic COVID-19 Cases**

- SMCOE requires that COVID-19 cases who tested positive but never developed COVID-19 symptoms not report to any SMCOE worksite or facility until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test; OR
- If a licensed healthcare professional determines the person is no longer a COVID-19 case, in accordance with CDPH or local health department recommendations.

### **COVID-19 Testing Not Required in Order to Return to Work**

- In accordance with CDPH guidance concerning symptom-based strategies for the discontinuation of isolation, SMCOE does not require employees to submit to a COVID-19 test, or produce a negative COVID-19 test result, in order to return to work.

### **Minimum Criteria to Return to Work for Employees Directed to Self-Quarantine or Isolate by a State or Local Health Official**

- If employees are subject to an isolation or quarantine order issued by a state or local health official, SMCOE requires that the employees not report to any SMCOE worksite or facility until the period of isolation or quarantine is completed or the order is lifted.
- If the order did not specify a definite isolation or quarantine period, then the period shall be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.

## Allowance by Cal/OSHA for an Employee to Return to Work

- If there are no violations of state or local health officer orders for isolation or quarantine, Cal/OSHA may, upon request, allow employees to return to work on the basis that the removal of employees would create undue risk to a community's health and safety.
- In such cases, SMCOE will develop, implement, and maintain effective control measures to prevent transmission in the workplace including providing isolation for the employees at the SMCOE worksite or facility and, if isolation is not possible, the use of respiratory protection in the workplace.

## Appendix A: Identification of COVID-19 Hazards

All persons, regardless of symptoms or negative COVID-19 test results, will be considered potentially infectious. Particular attention will be paid to areas where people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not. For example: meetings, entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

Evaluation of potential workplace exposure will be to all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

**Person conducting the evaluation:** Denise Porterfield

**Date:** April through May 2020 and Ongoing

**Name(s) of employee and authorized employee representative that participated:** Margie Gustafson and Richard Maldonado

### Evaluation Form

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

## Appendix B: COVID-19 Inspections

**Date:** Summer 2020, Fall 2020, and ongoing

**Name of person conducting the inspection:** Richard Maldonado

**Work location evaluated:** 101 Twin Dolphin Drive, San Bruno site, Gateway, ACC

SMCOE's facilities checklist can be found on the [SMCOE website](#).

## 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 SMCOE 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:** Ongoing

**Name of person conducting the investigation:** Tami Moore, Director, Human Resources

All COVID-19 contact tracing/investigation information is kept confidential in the Human Resources Office and available for inspection. Cal/OSHA form 300 with confidential information is also kept in the Human Resources Office. Notification notices are also kept on file in the Human Resources Office.

### Contact Tracing Report

Employee (or non-employee*) name:		Occupation (if non-employee, why they were in the workplace):	
Location where employee worked (or non-employee was present in the workplace):		Date investigation was initiated:	
Was COVID-19 test offered?		Name(s) of staff involved in the investigation:	

Date and time the COVID-19 case was last present in the workplace:		Date of the positive or negative test and/or diagnosis:	
Date the case first had one or more COVID-19 symptoms:		Information received regarding COVID-19 test results and onset of symptoms (attach documentation):	
Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):			

Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:		
All employees who may have had COVID-19 exposure and their authorized representatives.	Date:	
	Names of employees that were notified:	
Independent contractors and other employers present at the workplace during the high-risk exposure period.	Date:	
	Names of individuals that were notified:	

<p>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</p>		<p>What could be done to reduce exposure to COVID-19?</p>	
<p>Was the local health department notified?</p>		<p>Date:</p>	

### **Appendix D: COVID-19 Training Roster**

**Date:** June 15, 2020; June 16, 2020; June 17, 2020; July 28, 2020; August 11, 2020; August 25, 2020; September 1, 2020; September 30, 2020; October 27, 2020; October 30, 2020; December 1, 2020; January 7, 2021; and ongoing.

**Person that conducted the training:** Lori Musso/Jill Vandroff

**Training conducted by Zoom for all employees.**

### **Additional Considerations (applies to all employees)**

#### **Multiple COVID-19 Infections and COVID-19 Outbreaks**

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

#### **COVID-19 testing**

We will provide COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local 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 30 days that the outbreak continues.
  - In response to new information or to new or previously unrecognized COVID-19 hazards.
  - When otherwise necessary.
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We will consider:
  - Moving indoor tasks outdoors or having them performed remotely.
  - Increasing outdoor air supply when work is done indoors.
  - Improving air filtration.
  - Increasing physical distancing as much as possible.

## **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, SMCOE will contact San Mateo County Health for guidance on preventing the

further spread of COVID-19 within the workplace.

- We will provide San Mateo County Health 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 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 San Mateo County Health, 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**.