



West Contra Costa Unified School District 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 [CPP](#) template. Employers can also create a written [CPP](#) by incorporating elements of this program into their existing Injury and Illness Prevention Program (IIPP), if desired. Cal/OSHA 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

Revised:
February 12, 2021
March 2, 2021
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April 12, 2021



West Contra Costa Unified School District

COVID-19 Prevention Program (CPP)

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

Revised: February 12, 2021

1. Authority and Responsibility

The Superintendent, Matthew Duffy, or designee 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.

2. Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the **Appendix B: COVID-19 Inspections form** as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.

a. Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by notifying their site administrator and/or direct supervisor.

Evaluation of potential COVID-19 hazards will be identified and documented using **Appendix B: COVID-19 Inspection form**.

b. Employee screening/Asymptomatic Testing

WCCUSD will adhere to most current CDPH guidelines unless CDC, Contra Costa County Health Services provides different protocols. The parties agree that where these guidelines are not in agreement, WCCUSD shall adhere to the guidelines that provide the greatest level of safety for WCCUSD students and staff. The Parties also recognize that individual portions of the District may have different case levels which may require additional screening above that which is required for the County as a whole.

The following protocols and procedures will be implemented:

- The District will provide training to employees, students and families on how to engage in a Daily Attestation for symptoms of COVID-19 at home and will advise them not to report to work/school if they have COVID-19 symptoms that cannot be attributed to another health condition.
- The District will contract with an outside vendor(s)/agency(ies) to provide asymptomatic testing for COVID-19 at no expense to employees and students. The cadence utilized for testing shall align to the current COVID-19 tier in Contra Costa County as defined in CDPH's most current guidance and adheres to the guidance that provides the greatest level of safety for WCCUSD students and staff.
- The District shall provide families/parents and staff with frequent reminders of these procedures and guidelines.
- Staff will utilize an online system to log in each day on campus, when this log-in occurs they will respond to a daily health screening.
- Students and parents will attest and provide a signed waiver that they will not attend school any day where they answer the self-health screening as having a risk issue.

3. Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented and reported to the appropriate District Department 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.
- Appropriate staff will be assigned and responsible for timely correction.
- Follow-up measures will be taken to ensure timely correction.

4. Control of COVID-19 Hazards

a. Physical Distancing

WCCUSD will observe and follow the prevailing health guidance and directives issued by the state of California, the California Department of Public Health (CDPH) and the Contra Costa County Department of Public Health (CCCH) for physical distancing and ensure that guidelines and protocols for physical distancing are known by employees, students and families/parents. Where these guidelines are not in agreement, WCCUSD shall adhere to the guidelines that provide the greatest level of safety for WCCUSD students and staff. The following protocols and procedures will be implemented:

- The District will post appropriate signage at each school and work area pertaining to physical distancing.
- The District will post appropriate signage reminding individuals to maintain physical distancing within a particular space.
- Physical distancing markers will be placed on floors, sidewalks and walkways where individuals typically wait to reinforce physical distancing. Staff will teach and reinforce the use of these markers for compliance by students.
- WCCUSD shall ensure that multiple areas for ingress and egress at each school site are designated, marked and communicated to employees, students, and families to reinforce physical distancing among individuals.
- Directional protocols for foot traffic will be in hallways and corridors may be established and marked to support physical distancing.
- School administrators, in consultation with [staff](#), shall create plans and schedules that provide lunch (in accordance with USDA and WCCUSD reopening guidelines), recess, and break times for students and employees that allow individuals to maintain physical distance from each other.
- The number of employees and students in any given area shall be limited to that which can be safely accommodated to ensure physical distancing of at least 6 feet (based upon CDPH guidelines), to the extent possible, between employees/students and between students/students.
- When an employee's workspace does not allow for physical distancing, employees will work with their supervisor to identify an alternate workspace and/or remote work arrangements, whenever practicable.
- Furniture in classrooms and work areas will be arranged as necessary to support physical distancing between employees, between employees and students, and between students and students.
- WCCUSD will minimize the presence of non-essential visitors including parents/family members, community members and volunteers on school campuses and work sites during business hours. (All visitors-parents and community must adhere to all safety protocols while on campus at all times.)
- WCCUSD and schools shall provide families/parents and staff with frequent reminders of these procedures and guidelines.
- Each school site shall designate a dedicated space(s) to safely isolate and supervise students who feel ill.
- Employees shall not socially congregate in any workspace, including but not limited to break rooms, common lunch areas, hallways, restrooms, and other workspaces. No social activities shall take place in any workspaces in order to protect the health and safety of all and prevent COVID-19 spread. No potlucks or other food sharing will be permitted on campus.

b. Face Coverings

WCCUSD will observe and follow the prevailing health guidance and directives issued by the state of California, the California Department of Public Health (CDPH) and the Contra Costa County Department of Public Health (CCCH) for physical distancing and ensure that guidelines and protocols for physical distancing are known by employees, students and families/parents. Where these guidelines are not in

agreement, WCCUSD shall adhere to the guidelines that provide the greatest level of safety for WCCUSD students and staff.

All employees, age-appropriate students, and visitors are expected to wear appropriate face coverings and ensure they are worn over the nose and mouth at all times when indoors and outdoors as provided in public health guidance. These requirements will be observed and enforced at all WCCUSD schools, buildings, facilities, and departments. Parents are highly encouraged to provide their students with an appropriate reusable mask. In addition, the District will make appropriate face coverings, disposable surgical masks, and reusable face shields available to all employees and students based upon the need of the student and staff function. A PPE Usage Chart will be provided to all employees for the purpose of providing information on appropriate use of PPE in the workplace.

The following are exceptions to this requirement in the workplace:

- Individuals who cannot wear a mask because of a special circumstance such as a particular developmental or medical or health condition or doctor's order as verified by an administrator. Such individuals may be required to wear an appropriate or prescribed alternative face covering.
- Face coverings and face shields may not be required for individuals with a medical apparatus which prevents or obstructs the use of the apparatus.
- Specific tasks that cannot reasonably be performed with a face covering, where employees will maintain appropriate physical distance from others.
- During meal periods when physical distancing requirements are maintained.
- Face coverings may be removed when an employee is working in isolation in dedicated individual workspaces. Employees must post signage on the doors of their workspaces when working in isolation behind closed doors without a face covering.

c. Engineering controls

We implement the following measures for situations where we cannot maintain appropriate spacing per guidelines between individuals:

- Plastic Plexiglass barriers are available upon request and as needed. On public-facing countertops in offices. Plastic barriers are specifically placed to function in conjunction with (1) universal and mandatory mask wearing, (2) appropriate physical distancing guidelines and protocols, including but not limited to floor-mounted stickers, and (3) ventilation systems in our buildings.
- Employees may request additional plexiglass barriers as needed.

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

- Fresh Air: We encourage and allow the introduction of fresh outdoor air by opening windows or doors where possible.
- Improved air filtration: The District is upgrading all HVAC air filters in all its buildings to MERV-13, which meets the guidance from the American Society of Heating and Refrigerating and Air Conditioning Engineers (ASHRAE) on how best to handle COVID-19.
- Outdoor Air Ventilation: The District has made adjustments in its HVAC systems to maximize fresh air flow and to reduce the recirculation of indoor air.
- Systems Maintenance: The District replaces its air filters and filtration systems biannually or per

manufacturer's recommendations.

- Ventilation While Cleaning and Disinfecting: The District has updated its cleaning equipment and procedures. Work spaces are allowed to ventilate after cleaning before employees and students arrive.
- Additional precautions (eg., the use of portable Air Purifiers with HEPA filters) will be taken to maintain air quality in the classroom and work spaces where outside air ventilation is not available.

d. Cleaning and Disinfecting

We implement the following cleaning and disinfection measures:

- Daily cleaning of all workspaces, including vacuuming and mopping of high-traffic surfaces.
- Daily cleaning and disinfecting of high touchpoint surfaces, including light switches, door handles, push panels, panic bars, faucets and counter spaces.
- Desks will be disinfected daily.
- Daily cleaning, disinfecting and restocking of restrooms with emphasis on hand soap and paper towels.
- Daily checking and restocking of hand sanitizer and other supplies in classrooms and common work areas.
- Daily removal of trash and recycle bins in classrooms, offices and common areas.
- Ensuring adequate supplies and time for proper cleaning and disinfection of classrooms and workspaces.
- Deep cleaning and disinfection after a confirmed case of COVID-19 in any workplace is completed by the District's trained custodial services staff. Cleaning supplies must be EPA approved COVID-19 disinfectants: www.epa.gov

e. Shared tools, equipment and personal protective equipment (PPE)

- The District does not permit the sharing of PPE, including masks, gloves, gowns and face shields, and other items as needed.
- Employees are strongly discouraged from sharing items they come into regular physical contact with, including phones, headsets, desks, keyboards, writing materials, instruments and tools, to the extent feasible.
- Where items must be shared, they will be disinfected between uses. The District will provide cleaning and sanitizing supplies for this purpose.
- Sharing of District vehicles for work-related purposes is minimized to the extent feasible. High touchpoint areas in vehicles, including the steering wheel, door handles, seat belt buckles, armrests, shifter, etc.) will be disinfected between users. Masks will be required in shared vehicles.

f. Hand sanitizing

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

- Provide hand sanitizer which contains at least 60% ethyl alcohol for every classroom and restroom and in common work areas (office work rooms, faculty rooms etc.).
- Ensure that all sinks are functioning with running water and are kept stocked with hand soap and paper towels.
- Encourage and allow time for employees and students to engage in regular handwashing and to use hand sanitizer when handwashing is not readily available.
- Encourage employees and students to wash their hands for at least 20 seconds.

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

We evaluate the need for PPE as required by CCR Title 8, section 3380, and provide sufficient PPE to employees at all work sites to aid in preventing the transmission of COVID-19 among individuals. The PPE Usage Chart will be provided to all employees for the purpose of providing information on appropriate use of PPE in the workplace.

Additional measures will be taken to safeguard employees and students in Special Education programs, including the following:

- Employees working in Special Education programs will have access to and be provided PPE that District nurses/health educators have categorized for use and various levels of risk.
- Employees working with medically fragile students and assisting with feeding and toileting measures will be provided additional PPE (i.e., gowns, gloves, goggles, face shields), and wipes, changing tables, trash can liners, and other cleaning and sanitation items as needed.
- Employees will be trained on appropriate procedures for using (donning/doffing) and disposing of PPE.
- The District will maintain, at minimum, one month's supply, available through the District Warehouse, of PPE at each school site for use by staff and students in Special Education programs.

We provide and ensure the use of eye protection and respiratory protection in accordance with CCR Title 8, section 5144, when employees may be or are exposed to procedures that may aerosolize potentially infectious material.

5. Investigating and Responding to COVID-19 Cases

The WCCUSD COVID-19 Decision Tree will be consistently followed in responding to employees and students (being developed) who are or may be exposed or who are experiencing symptoms of COVID-19.

The Decision Tree will be consistently followed when reporting, processing and responding to confirmed employee/student cases of COVID-19 at all District sites. The WCCUSD COVID-19 Decision Tree was initially developed for staff and will be modified for students and posted.

Upon receiving notification of a COVID-19 outbreak, the District will investigate Contra Costa County and determine possible workplace-related factors that contributed to the outbreak. This will be accomplished by using the **Appendix C: Investigating COVID-19 Cases**.

6. System for Communicating

Our goal is to ensure that we have effective two-way communication with [WCCUSD](#) employees, in a form they can readily be understood, and that it includes the following:

- Employees are provided periodic reminders of best practices to observe to prevent the transmission of COVID-19 in the work environment.
- Employees are advised and encouraged to promptly report COVID-19 symptoms or hazards to their school site administrator/immediate supervisor. Such reports can be made without fear of reprisal.
- Written notification is provided to employees, students and families by school site/department leadership whenever an individual on any campus tests positive for COVID-19.
- Within 24 hours of District notification and completion of investigation, the District personally contacts individuals deemed to be close contacts of a positive COVID-19 case. Close contacts will be informed of their exposure to COVID-19, recommendations to quarantine and leave their work site will be made, and they will be informed of their option to work remotely (if able) or take leave. Recommendations to seek testing for COVID-19 at no cost will be made. A follow-up letter regarding the recent positive case(s) will be sent to non-close contacts that were present on site after the completion of the investigation. The letter will also inform them of the employer's actions to be taken to mitigate further spread of the virus as well as recommendations for testing and consultation with their medical provider as needed.
- Employees who are exposed to COVID-19 at work are offered testing for COVID-19 at no cost during normal work hours assuming testing is available.
- Employees who have been exposed to or who have symptoms of COVID-19 are encouraged to pursue testing through available county resources or through their health care provider.
- In the event the District is required to provide testing due to an outbreak, it will communicate the plan for providing testing to affected employees, the reason for the testing, and the possible consequences of receiving a positive test.
- In accordance with the Americans with Disabilities Act (ADA), the District engages in the interactive process with all employees requesting or needing a workplace accommodation(s) due to a medical disability or health condition that creates an increased health risk due to COVID-19.

7. Training and Instruction

We will provide effective training and instruction to all employees that includes:

- Policies and [infection control](#) procedures to protect employees from COVID-19 hazards.
- COVID-19 information such as:
 - o COVID-19 is an infectious disease that is spread through respiratory droplets that travel through the air in close proximity before settling on surfaces.
 - o COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
 - o An infectious person may be asymptomatic.

- The symptoms of COVID-19 and how to engage in passive assessment for symptoms at home prior to reporting for work.
- The importance of prompt reporting of symptoms of COVID-19 to one's administrator/ direct supervisor, of not reporting for work, and seeking a test for COVID-19 when an employee has symptoms of COVID-19.
- Explanation of procedures that will be used to isolate individuals who display symptoms of COVID-19 at work pending their removal or exclusion. [Isolation Room Protocol](#)
- Methods of physical distancing and the importance of combining physical distancing with other controls (masking, handwashing, etc.) to mitigate spread of the virus.
- Personal protective equipment protocols that will be provided to employees and how to properly use it.
- Upon return a safety orientation will occur for students and to be shown/viewed in class.
- Information about cleaning schedules, protocols, and expectations applicable to the work site.
- Proper care of face coverings and the fact that face coverings are intended to provide protection to other individuals from the wearer of the face covering.
- 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.
- Periodic updates on the science and evolving knowledge related to the prevention and transmission of COVID-19.
- Strategies for maintaining one's mental and emotional health in the COVID-19 environment.
- The District will provide periodic reminders to employees of effective practices for safeguarding one's health and preventing the contraction and transmission of COVID-19.

8. Exclusion of COVID-19 Cases

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

- Prompt cleaning/disinfecting of any known area(s) in which the individual is known to have been present on school site/departments within the past 7 days and presumed infectious based on public health guidance.
- Excluding individuals with exposure to COVID-19 for 10 days after the last known date of exposure.
- Ensuring that all confirmed COVID-19 cases are excluded until all return-to-work/ school requirements are met.
- Allowing employees who are able to render services working remotely while in quarantine due to COVID-19 to do so without adverse impact to their pay or accrued sick leave.
- Providing excluded employees who cannot work remotely due to COVID-19 with information about leave benefits and options available to them.
- Informing employees who contract COVID-19 at work of their right to file a workers compensation claim. Pursuant to SB 1159, the District will not contest a worker's compensation

claim for any employee whose illness from COVID-19 rises out of the course and scope of their employment.

9. Reporting, Recordkeeping and Access

It is WCCUSD policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by state or local public health guidance and law, and provide any related information requested by Contra Costa County Health Services.
- 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 their 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 all times to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use the **Appendix C: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19 cases.
- Maintain on the District's website for public inspection a dashboard of all confirmed COVID-19 cases on each school site.

10. Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
 - o At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
 - o COVID-19 symptoms have improved.
 - o 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.
 - 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.
 - Person(s) who have tested positive in the past 90 days and have already completed isolation are not required to quarantine after an additional exposure event within that time frame unless they become symptomatic per public health guidelines.
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Appendix A: Identification of COVID-19 Hazards

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

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

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

[enter date]

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

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

Appendix B: COVID-19 Inspections

Date: **[enter date]**

Name of person conducting the inspection: **[enter names]**

Work location evaluated: **[enter information]**

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/ partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
[add any additional controls your workplace is using]			
[add any additional controls your workplace is using]			
Administrative			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
[add any additional controls your workplace is using]			
[add any additional controls your workplace is using]			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/ goggles			
Respiratory protection			
[add any additional controls your workplace is using]			

Appendix C: Investigating COVID-19 Cases

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

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

Date: **[enter date]**

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

Employee (or non-employee*) name:		Occupation (if non-employee, why they were in the workplace):	
Location where employee worked (or non-employee was present in the workplace):		Date investigation was initiated:	
Was COVID-19 test offered?		Name(s) of staff involved in the investigation:	
Date and time the COVID-19 case was last present in the workplace:		Date of the positive or negative test and/or diagnosis:	
Date the case first had one or more COVID-19 symptoms:		Information received regarding COVID-19 test results and onset of symptoms (attach documentation):	
Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):			

Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:

All employees who may have had COVID-19 exposure and their authorized representatives.	Date:		
	Names of employees that were notified:		
Independent contractors and other employers present at the workplace during the high-risk exposure period.	Date:		
	Names of individuals that were notified:		
What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?		What could be done to reduce exposure to COVID-19?	
Was the local health department notified?		Date:	

*Should an employer be made aware of a non-employee infection source COVID-19 status.

Additional Consideration #1

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 10-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 Contra Costa County Health Services or the relevant 10-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 10-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.

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 Contra Costa County Health Services 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 of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 10-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 Contra Costa County Health Services.