

COVID-19 PREVENTION PROGRAM (CPP) MT. DIABLO UNIFIED SCHOOL DISTRICT UPDATED SEPTEMBER 7, 2021 This CPP is designed to control exposures to the SARS-CoV-2 virus (COVID-19) that may occur in our workplace.

Authority and Responsibility

The Superintendent of Mt. Diablo Unified School District has overall authority and responsibility for implementing the provisions of the COVID-19 Prevention Program (CPP) in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

All employees are responsible for using safe work practices, following all directives, policies and procedures, and assisting in maintaining a safe work environment.

Identification and Evaluation of COVID-19 Hazards

We will implement, or already have implemented, 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 an electronic survey tool, 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. All site supervisors and managers email the MDUSD covid@mdusd.org email and
 submit a Contact Tracing log (See Appendix) for each reported case of Covid-19
- Review applicable orders and general 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 an electronic survey tool 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
- Maintain a data collection field on our contact tracing form where employees can identify and report COVID-19 hazards for each reported case of COVID-19

Employee Participation

- We request employees to participate in the identification and evaluation of COVID-19 hazards by reporting hazards directly to site/department managers, or to their labor organization representatives, or to Human Resources at covid@mdusd.org
- Employees are requested to participate in the identification and evaluation of COVID-19 hazards by informing the employee's supervisor of the hazard
- Representatives who would like to discuss the CPP or COVID-19 hazards are encouraged to contact the Chief of Human Resources.

Employee Screening

- Parents/guardians are being asked to monitor their child's health daily for symptoms of illness at home and to not send children to school if they are ill. Daily school site based attestations are no longer currently required.
- <u>Click here for a COVID-19 symptom screening list to be used at home daily.</u> Students, staff, parents/guardians, and community members are expected to self-monitor, and to not enter school facilities if symptomatic.
- Employees who are symptomatic may not report to, or remain at, work and should seek medical advice. Employees should report their absence and symptoms to their supervisors and follow department procedures for absences.
- All Supervisors will use the MDUSD Covid-19 Response and Reporting guidelines for appropriate actions.
- All employees are obligated to report immediately if they know, or learn, that they have been directly
 exposed to anyone that has tested positive for or who are exhibiting symptoms of COVID-19

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be initially documented on the Appendix B: COVID-19 Inspections form and corrections will be made in a timely manner based on the severity of the hazards, and then on an ongoing basis during contact tracing interviews (or when independently reported) as follows:

Correction of COVID-19 Hazards		
Example:	Responsible Party(ies):	Timeline
 Insufficient PPE/cleaning materials supply 	 First report to site/department manager or custodian If unresolved, next report to Director of Maintenance & Operations 	Immediate response
Uncontrolled entrance of public	Report to site/department manager	Immediate response
 Non-compliance of staff with mask wearing, social distance (if/when applicable), self- reporting, testing, or other safety mandates 	Report to site/department manager	 Immediate response at time of violation Refer to HR as necessary
Non-compliance of students with mask wearing, social distance (if/when applicable), self- reporting, testing, or other safety mandates	 Staff corrects and documents violation with student Document warnings Report to administrative staff 	Immediate response at time of violation

Non-compliance of visitors with mask mandates	 Staff corrects Report to administrative staff 	Immediate response: remove from premises
Irregular/Insufficient Cleaning	 First report to the site/department manager and/or custodian. If unresolved, next report to Director of Maintenance & Operations 	Corrected as soon as possible
Engineering Controls Issues	 First report to site/department manager or custodian Tag Work Order as COVID related 	Corrected as soon as possible

Control of COVID-19 Hazards

Face Coverings

Face coverings are an effective method that can help stop or slow the spread of infectious disease by limiting the contact between people. Masks are to be worn properly by employees over the nose and mouth when indoors, and in the future as required by orders from the California Department of Public Health or local health department.

- Face coverings must be clean and undamaged
- Face covering exemptions are limited to individuals with documented disabilities or medical conditions
- Face covering exemptions are permitted when;
 - An employee is alone in an enclosed room
 - While eating or 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
 - The nature of the work precludes it and in such situations, physical distancing will be practiced at all times
 - Specific tasks that cannot feasibly be performed with a face covering. This exception is limited to the time in which such tasks are being performed.
- Employees exempted from wearing face coverings due to a medical condition, mental health condition, or disability shall wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits it.

The District will also:

Post visual reminders/signage

- Have staff remind all visitors to wear masks at all times and report problems to a supervisor for assistance as needed
- 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
- Provide a face covering to any employee that requests one, regardless of their vaccination status.

Engineering Controls

We maximize, to the extent feasible, the air circulation for our buildings by:

- Installing air filters at a MERV 13 or higher rating
 - o All filters are within CDC standards and guidelines for appropriate air filtration
 - Rating allowed is based on the age of the unit. Newer units are able to utilize higher MERV ratings
- Replacing filters every 3 months

Note: Intermittent opening of windows and doors while system is running is okay for no more than 10 minutes per hour to ensure systems are able to work properly

Cleaning and Disinfecting

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

- All high touch areas, including door handles, sink faucets, water stations, and light switches will be cleaned and disinfected throughout the day (as time allows) with manual application or with a Germ Buster sprayer.
- All restrooms will be cleaned and disinfected (with added attention on restocking hand soap, paper towels and hand sanitizer at least once a day), including with the Germ Buster sprayer. Additional cleaning and disinfecting as time allows throughout the day.
- All occupied support staff areas, clerical center, and main offices will be fully cleaned and disinfected at least once a day, including with a Germ Buster sprayer. Floor surfaces will be vacuumed, swept and/or mopped daily.
- All occupied classrooms will be cleaned, per assigned route, including removing trash, and disinfected
 at identified high touch areas (entry/exit paths and all common areas to include high touch surfaces
 such as light switches, door handles, faucets, counter spaces) at least once a day. Disinfecting will be
 completed with the Germ Buster sprayer.
- Added attention to cleaning and disinfecting will be given to all entry/exit paths and all common areas to
 include high touch surfaces such as light switches, door handles, faucets, counter spaces at least once
 a day.
- Any desk or conference tables that may be used for meetings, assessments, or in common areas will be cleaned and disinfected at least once a day.
- Check and restock hand sanitizer and other needed supplies in all common areas daily.

Hand Sanitizing

To implement effective hand sanitizing procedures, we are:

- Encouraging employee handwashing.
- Providing employees with an effective hand sanitizer, and prohibiting hand sanitizers that contain

- Methanol (i.e., methyl alcohol).
- Encouraging employees to wash their hands for at least 20 seconds each time.

The District will remind employees that:

- Employees should wash hands often with soap and water for at least 20 seconds, especially after having been in a public place, or after blowing their nose, coughing, or sneezing.
- If soap and water are not readily available, use a hand sanitizer that contains at least 60% alcohol. Cover all surfaces of your hands and rub them together until they feel dry.
- Employees should notify site/department supervisor or custodian if hand-washing supplies are in low supply

In addition, the following will continue to occur:

- Custodians will check restroom facilities frequently and make sure they are clean and sanitary and supplies of soap, paper towels are adequately stocked
- Staff will regularly clean and sanitize high-touch surfaces
- The District will make sure hand washing supplies in other areas are re-stocked regularly and have running water
- District will post visual reminders/signage

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

- Follow MDUSD COVID procedures developed by HR and as listed on the Risk Management Department or District website.
- Work with the guidance of the Contra Costa Health Services as needed and as we identify the area(s) of exposure
- All surfaces, high touch and other, within area(s) of exposure will be disinfected & sanitized including
 door handles, sink faucets, water stations, and light switches, tables, chairs, teaching station or desk,
 counters, window sills, etc., with manual application and with a Germ Buster sprayer.
- Floor surfaces will be vacuumed, swept and/or mopped and sanitized
- All restrooms identified as area of exposure will be cleaned and disinfected, with manual application and with a Germ Buster sprayer (including restocking hand soap, paper towels and hand sanitizer)
- All trash and recycle bins will be emptied and sanitized.

Shared tools, equipment and personal protective equipment (PPE)

PPE must not be shared (e.g. gloves, goggles and face shields).

The District will:

- Reduce sharing of items such as phones, keyboards, writing materials, office equipment. If unavoidable, shared items should be disinfected between uses. Disinfecting materials are available for between uses to all employees
- Remind staff that PPE such as gloves, goggles, masks and face shields should not be shared
- Post visual reminders/signage
- Minimize the sharing of vehicles to the extent feasible

Note: Disinfectant & paper towels are available for all staff members to carry in district work vehicles.

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

- Employer shall evaluate the need for personal protective equipment to prevent exposure to COVID-19 hazards and provide personal protective equipment as needed.
- Employers shall provide and ensure use of respirators in accordance with section 5144 when deemed necessary by the Division through the Issuance of Order to Take Special Action, in accordance with title 8, section 332.3.
- Employers shall provide and ensure use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

Testing of Symptomatic Employees

We make COVID-19 testing available at no cost to employees with COVID-19 symptoms who are not fully vaccinated. Countywide COVID-19 testing is available at no cost to the employee and may be scheduled during their working hours.

See https://www.coronavirus.cchealth.org/get-tested

Investigation and Response 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 **Appendix C: MDUSD Contact Tracing Form for Supervisors**

- Supervisors will follow the MDUSD COVID-19 Response and Reporting Guidelines for employees who have a potential COVID-19 exposure
- Countywide COVID-19 testing is available at no cost to the employee and may be scheduled during their working hours. See https://www.coronavirus.cchealth.org/get-tested
- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to employees.
- Written notice will be provided within one day of employer knowledge of a COVID-19 case that people at the worksite may have been exposed. This notice will be provided to all employees (and their authorized representative), independent contractors and other employers at the worksite 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), and in a form readily understandable by employees and can be anticipated to be received by the employee.

Systems for Communicating

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

- Employees should report COVID-19 symptoms and hazards to their direct supervisor per the MDUSD COVID-19 Response and Reporting Guidelines.
- Employees can report symptoms and hazards without fear of reprisal.
- COVID-19 symptoms and hazards will be reported <u>by supervisors</u> to <u>covid@mdusd.org</u>
- In the event we are required to provide testing because of a workplace exposure or outbreak, we will
 communicate the plan for providing testing and inform affected employees of the reason for the testing
 and the next steps if they have a positive test. Employees may be asked to rearrange their work

- schedule in order to reserve and attend a testing appointment that is completed in its entirety during employee work hours whether through a healthcare provider or the county. Requested mileage reimbursement will also be provided to employees.
- Information about COVID-19 hazards are shared by following MDUSD COVID-19 Response and Reporting Guidelines. These guidelines are accessible on the MDUSD Risk Management Department webpage, have been shared with all MDUSD managers are continually updated, and have been shared in the Friday Superintendent's Report.
- Employees who have symptoms of COVID-19 and suspected to have exposure should immediately report their symptoms to their supervisor and quarantine until receiving further instructions.
- Employees should immediately inform their supervisor if they, or someone in their household, are positive for COVID-19.
- If an employee (or member of their household) tests positive, they must quarantine at home for the required period (determined through CHPD, their health care provider, and/or MDUSD health staff contact tracers in consultation with CHPD)
- The employee's direct supervisor will complete the Contact Tracing Investigation Form with the employee to determine close contacts.
- Close contacts of employees in guarantine will be notified and may also be guarantined as well.
- Non-close contact employees who are in proximity at a site or department will be notified through a written "Covid-19 Notification" which does not disclose confidential information regarding the identity of the positive person. These employees will not need to quarantine (per current state and federal guidelines).

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 sick and vaccination leave) to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
 - o 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 the respirator.
 - 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.
 - o 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.

Training completion will be documented either utilizing the **Appendix D: COVID-19 Training Roster** form or a similar electronic survey form.

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.
- Use the **Appendix C: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19 cases.

Return-to-Work Criteria

As of September 7, 2021 (and subject to change):

COVID-19 Symptoms But Not a Close Contact

(e.g., fever, cough, loss of taste or smell, difficulty breathing)

Symptom screening per CDC

Send home and advise contact with primary care provider for recommendations regarding need for testing. If not available through their primary care provider, testing is available through CCHS.

If negative COVID-19 test result (PCR alone is preferred and recommend PCR confirmation of a negative antigen test result) or COVID-19 ruled out by primary care provider (something else other than COVID-19 infection is reason for symptoms), can return 24 hours after fever resolves and symptoms have improved.

If not tested and does not see primary care provider to identify cause of symptoms, can return to school 10 days after symptom onset.

If symptomatic **and** a known contact to a positive case, refer to the "Contact to COVID19 – Symptomatic" instructions below.

Close Contact** to COVID-19 and Symptomatic

**Close contact is being within 0-6 feetof a case for 15 minutes or longer ina 24-hour period

Symptomatic students, teachers, and staff must <u>quarantine at home</u>, <u>regardless of their vaccination status</u> (even if fully vaccinated), masking, or recent COVID infection history. Testing* is highly recommended and if completed and returns positive, refer to actions and follow up for "Positive COVID-19." Iftest is negative, must complete 10-day home quarantineand symptom monitor Day 11-14, wear a mask around others, and avoid crowds.

Positive COVID-19 PCR or Antigen Test Result

Must isolate at home, regardless of vaccination status(even if fully vaccinated). The timeline for return is:

- <u>With symptoms</u>: May return after 10 days have passed since start of symptoms, as long as symptoms are improving and there is no fever for 24 hours (without fever-reducing medication).
- <u>Without symptoms</u>: May return after 10 days have passed since the date of positive COVID-19 test. If symptoms develop during isolation period, may return 10 days after test if symptoms are improving and no fever for 24 hours (without fever-reducing medication).

No repeat testing required to return to school.Next Steps:

- 1. Identify close contacts and proceed with case notification.
- 2. Quarantine and exclude exposed contacts as described in the two rows below. The last date the case was present at school while infectious is Day 0.

Recommend <u>testing</u>* of contacts to identify additionalcases. Testing negative <u>after</u> Day 5 (i.e. on Day 6+) may also short

Close Contact** to COVID-19 and No Symptoms

**Close contact is being within 0-6 feetof a case for 15 minutes or longer ina 24-hour period

Fully-vaccinated[†] **students, teachers, and staff without any symptoms** do not need to quarantine, but testing is still recommended 3-5 days after close contact. If symptoms develop, isolate at home and inform providerabout recent close contact.

Unvaccinated teachers and staff (or vaccination status unknown) with no evidence of recent COVID infection should quarantine at home for 10 days from date of last exposure. Teachers and staff are not eligible for modified quarantine or shortened quarantine.

Unvaccinated teachers and staff (or vaccinationstatus unknown) with evidence of recent COVID infection and have remained asymptomatic may not need to quarantine[‡].

‡For a person who was previously diagnosed with symptomatic, lab-confirmed COVID-19, quarantine is not recommended if this exposure was within 90 days of COVID-19 symptom onset. For a person who was previously diagnosed with asymptomatic, lab-confirmed COVID-19, quarantine not recommended if this exposure was within 90 days of positive-test result.

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MDUSD Superintendent, Adam Clark Ed.D		Date: 9/8/2021

Appendix A: Initial Spring 2021 and Ongoing 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 evaluatior	the evaluation	the e	conducting	Person
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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, including barriers, partitions and ventilation

Appendix B: Initial Spring 2021 and Ongoing COVID-19 Inspections

Date:

Name of person conducting the inspection:

Work location evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Maintenance & Operations			
Barriers/partitions			
Ventilation (HVAC Equipment Operating Properly)			
Ventilation (Fresh Air - Door/Window Operational, if applicable			
Safety Signage (Mask Wearing, Social Distancing, Hand Washing, if applicable)]			
Wall Mounted Sanitizer Dispenser Installed			
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			
PPE (not shared, available and being worn)			
Face coverings (Worn Properly)			

Gloves, if applicable		
Face shields/goggles, if applicable		
Respiratory protection, if applicable		
Surgical Gowns, if applicable		

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 unredracted 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.

The below contact tracing investigation form will be utilized and will be primarily based on the interview with the employee who is ill. Only employees who are considered "close contacts" for a minimum of 15 minutes or longer within a distance of 6 feet in a 24 hour period should be added to the below form. No other employees should be added to this form.

PLACE MDUSD CONTACT TRACING FORM IN PDF MERGE HERE

Appendix D: COVID-19 Training Roster

Date:

Person that conducted the training:

Employee Name	Signature

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

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.
 - Employees who were fully vaccinated before the multiple infections or outbreak and who do not have symptoms.
 - COVID-19 cases who did not develop symptoms after returning to work pursuant to our return-towork 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 will be 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.
 - o 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. For outbreaks, we will 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 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 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.
 - o 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.
 - o 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.
- o Improving air filtration.
- o Increasing physical distancing as much as feasible.
- o 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

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, exceptthat 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.
- 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 beencorrected.
- Implement any other control measures deemed necessary by Cal/OSHA