



Hillsides COVID-19 Prevention Program (CPP)

Date: May 19, 2021

Authority and Responsibility

Diana Buehler has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

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

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Conduct workplace-specific evaluations 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.

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards. Employees will report any facility concerns regarding cleanliness and disinfecting. Facilities will then follow up to make sure all protocols are followed and concerns are addressed and resolved.

Employee Screening

Passive Screening

Hillsides has communicated to all staff and the parents of students that individuals should not come to Hillsides if they have symptoms consistent with COVID-19 or if they have had close contact with a person diagnosed with COVID-19.

Individuals should not come to Hillsides if they have had close contact with a person diagnosed with COVID-19 **OR** if experience any of the following symptoms:

- Temperature of 100° F or more
- Fever or chills
- Cough



- Shortness of breath or difficulty breathing
- Fatigue
- Muscle or body aches
- Headache
- New loss of taste or smell (for adults only)
- Sore throat
- Congestion or runny nose
- Nausea or vomiting
- Diarrhea

Active Screening

Hillsides will actively screen all students, staff and visitors for COVID-19 symptoms before they enter the school site (CDPH) or any site offices or buildings. At the end of the day, all staff and students will be screened for symptoms before they leave Hillsides. Multiple staff have been trained by Hillsides Nursing department to properly screen for and identify symptoms. Staff conducting screening will be supplied with proper PPE including surgical masks, face shields, and disposable gloves. Checks must include a check-in concerning cough, shortness of breath, difficulty breathing and fever or chills and if the employee is currently under isolation or quarantine orders. Hillsides purchased Screening Kiosks to be used at all sites.

Upon arrival at any of Hillsides sites and before having access to the campus, all individuals will be screened for a temperature of 100.4 F degrees or higher. Temperature will be checked with a no-touch thermometer. All individuals will be asked in-person a series of questions to identify if they have experienced any of the following symptoms in the past 48 hours:

- Fever or chills
- Cough
- Shortness of breath or difficulty breathing
- Fatigue
- Muscle or body aches
- Headache
- New loss of taste or smell (for adults only)
- Sore throat
- Congestion or runny nose
- Nausea or vomiting
- Diarrhea
- Close contact with a person diagnosed with COVID-19 (Ask parent/caregiver if student is in elementary school).

The Exposure Management Plan will be initiated for any individual who screens positive for COVID-19 exposure or symptoms, or who develops symptoms during the school day. [See Exposure Management Plan for more information](#)

Testing

Hillsides has implemented a plan for incorporating surveillance testing of all personnel into regular school-operations.

- Hillsides will ensure access to periodic testing for all school staff to be implemented when instructed by the Department of Public Health based on local disease trends and/or after resolution of an outbreak at the school (K12) or any of our sites including exposed students or employees who are symptomatic or

have known or suspected exposure to an individual infected with SARS-CoV-2.

- Periodic testing for asymptomatic individuals with no known exposure.
- Ensure tests are considered accurate and reliable according to CDC and FDA guidelines.
- Students and employees who have symptoms consistent with COVID-19 infection or are quarantined because of exposure to case(s) at school have access to testing or be tested for COVID-19 infection (EXMP).
- Testing should be done only on a voluntary – rather than mandatory – basis. Any parents who choose not to consent should have a distance learning alternative for their child (CDC).
- Surveillance testing results will be reported to the Pasadena Department of Public Health

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented on the Appendix B: COVID-19 Inspections form and corrected in a timely manner based on the severity of the hazards, as follows: We use this form as guidance to inspect the site for reported concerns. If the employee reports an issue, we use this form to inspect all areas in reported site appropriate disinfecting will follow the inspection of the site.

Control of COVID-19 Hazards

Physical Distancing

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

- Eliminating the need for workers to be in the workplace – e.g., telework or other remote work arrangements. All employees that can work from home are encouraged to do so.
- Reducing the number of persons in an area at one time, including visitors. Occupancy numbers are based on the Tier level from the county.
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel. We have signs and floor markings.
- Staggered arrival, departure, work, and break times. We have a very flexible schedule with our workforce.
- Adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.
- Hillsides encourages staff to keep 6-foot distancing by wearing masks at all times.

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

Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department.

Describe how face coverings will be provided, replaced, and cleaned, as needed, as well as what your policies are should your employees encounter non-employees that are not wearing face coverings: Face coverings are provided when staff and visitors are checking in with nursing or the front desk staff and provided when needed. All face masks can be replaced at any time if soiled during their shifts or visitations. Employees are reminded by Division Chiefs and Managers to wear face coverings at all times.

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 who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

Any employee not wearing a face covering, face shield with a drape or other effective alternative for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is tested at least once weekly for COVID-19.

Engineering Controls

We implement the following measures for situations where we cannot maintain at least six feet between individuals: We have installed plexiglass barriers in common areas such as reception areas and we require staff to wear face masks and shields when they cannot keep 6 feet distances.

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

- Whether it is possible to increase filtration efficiency to the highest level compatible with the existing ventilation system.
- How the ventilation system will be properly maintained and adjusted, whether you own and operate the building, or not: Our HAVC system has been upgraded to use MERS 13 Filters that are replaced monthly. Air purifiers have been installed in all areas.
- We encourage windows and doors to be open while rooms are being occupied and cleaned.

Cleaning and Disinfecting

We implement the following cleaning and disinfection measures for frequently touched surfaces: Hillsides facilities will meet and maintain a high standard of cleanliness prior to reopening and throughout the school year. Hillsides has implemented measures to ensure appropriate cleaning and disinfecting of all school, offices and common spaces, surfaces and objects throughout these areas. Hillsides facilities staff:

- Follow CDC and California Department of Pesticide Regulation safe and correct application of disinfectants, using personal protective equipment and ventilation recommended for cleaning
- Hillsides Facilities staff utilize disinfectants on EPA List N
- Maximize ventilation of all spaces being disinfected by opening windows and doors as appropriate
- Conduct deep cleaning in the early morning before students arrive

Facilities Staff

Facilities staff responsible for disinfecting the school, all offices and common area are equipped with appropriate personal protective equipment, including gloves, eye protection, face masks, and gowns. They are also provided N95 respirators to be used when cleaning after a potential exposure. Facilities staff are trained on:

- How to follow manufacturer's directions for disinfectant products according to Cal/OSHA requirements for safe use, and as required by the Healthy Schools Act
- When to use PPE and which PPE is necessary for a particular situation
- How to properly use, remove and dispose of PPE.



- Proper disposal of PPE
- Proper hand washing

Cleaning Schedule

Hillsides staff follow a cleaning schedule to ensure all spaces, surfaces, and objects are regularly sanitized and to avoid improper use of cleaning products. Hillsides staff and Facilities staff will adhere to the following schedule:

- **Common areas and frequently touched items** (i.e. Breakrooms, Restrooms, Classrooms, Nurse's Office, Counseling /Student Support Rooms, Admin Offices). Facilities staff will clean at least daily and more frequently as resources allow using appropriate products.
- **Shared items** (i.e. Photocopier, keyboards, car keys, swing sets). Hillsides staff will thoroughly clean after each use.
- **High-touch surfaces** (i.e. doorknobs, handles, light switches, countertops, desks, phones, switches and buttons, printers/ copiers, grab bars, and handrails, plastic/glass barriers) cleaned by trained facilities staff at least daily.
- **Equipment and devices** (Desks and tables, chairs, van/bus seats, keyboards, phones, headsets, Keyboards, printers, copiers, pens, markers, white boards, trays, chairs, sensory items, touch-screens, etc.) should be cleaned between uses by the staff that used the equipment.
- **Floors** are cleaned by facilities staff each morning before students arrive. Staff use vacuums equipped with HEPPA filters.
- **Restrooms** are cleaned and restocked daily.

Supplies

Hillsides Maintenance Operations Manager and the Senior Director of Operations will conduct monthly reviews of Hillsides PPE and Cleaning supplies to ensure there is adequate inventory to protect employees and students and maintain a sufficiently sanitized environment.

PPE Supplies

Hillsides will securely maintain an adequate and ongoing supply of PPE available for both staff and students.

- Hillsides will be ordered at least six weeks in advance of need to account for potential delays in accessing materials.
- Hillsides supplies are securely stored in Hillsides Nursing department. Hillsides Administration, Nursing department and Facility staff have access to the PPE supplies.
- Hillsides instructional staff will check in with the nursing department to receive any needed PPE.
- Hillsides will purchase no-touch thermal-scan thermometers for symptom screenings. There will be one per instructional area, one in each office area and 2 additional. A total of 12 will be purchased.

Cleaning Supplies

Hillsides will maintain enough agency appropriate cleaning supplies to continuously disinfect all sites in accordance with CDPH guidance.

- Cleaning products are on the EPA-approved list N.
- All product label directions for appropriate dilution rates and contact times will be followed.



- Wherever possible, disinfectant products on list N with asthma-safe ingredients will be used. Products that contain peracetic acid, bleach or quaternary ammonium compounds are avoided.

All cleaning products at Hillsides are kept out of children's reach and stored with restricted access. Staff can access cleaning supplies from the supply closets and facilities as that area will be regularly stocked by Facilities and Hillsides Administration. Staff can use this supply for minor cleaning and sanitization. In case of an emergency clean up, staff will evacuate the immediate area and call Facilities to disinfect the space.

Disinfectants and cleaning supplies are available to employees in both Hillsides buildings at the following secure location(s): Hillsides Front Offices and Housekeeping Closets.

Hygiene Supplies

Hillsides will ensure sufficient supplies of hand sanitizers, soap, handwashing stations, no-touch trash cans, tissues, and paper towels are available.

Hand sanitizer dispensers are mounted in the Hillsides offices for staff access only. Sanitizer bottles in classrooms are locked up and restricted to staff access. Students and residents who need hand sanitizer will have it dispensed by staff and use it under direct staff supervision.

All employees are made aware of the daily cleaning schedule and when needed the hourly disinfecting schedule. Should we have a COVID-19 case in our workplace, we will implement the following procedures: Area is closed off and all individuals who had access to the area are notified and kept in a separate area. Area is aired out for 24 hours. At the end of the 24 hours facility staff will disinfect the entire area or room with approved disinfecting supplies. These staff will wear full PPE during this time. If we have a staff outbreak, we will hire an additional cleaning service to clean and disinfect the site.

If a student in our school program becomes symptomatic at home, parent/caregivers will contact the school and be directed to COVID-19 testing resources. This policy will be communicated to parent/caregivers before the school reopens for in-person learning. For anyone who is waiting to be picked up from school due to symptoms of COVID-19, or coming into close contact with someone with COVID-19, that person will be placed in an isolation room with monitoring, preferably in an area where others do not enter or pass. Provide divided spaces for those who are asymptomatic, separated from those who are symptomatic. Make sure that the person keeps a face mask on (provide with a surgical mask if possible). When a parent/guardian arrives to pick up a student, we will have the student walk outside, supervised, to meet them, if possible, instead of allowing the parent or guardian into the building since the parent may also have COVID-19.

For symptomatic residents, staff and students, the cohort or group will be immediately notified that a member of the cohort is displaying symptoms of COVID-19. However, the cohort will not be required to home isolate until the symptomatic individual receives a positive test result. Hillsides administration, therapist, or nurse will contact the families.

Employees are not to come to work if sick or if they are exposed to a person who has COVID-19. Per Pasadena Public Health employees who are fully vaccinated for COVID-19 (2 or more weeks after a 2-dose vaccine series OR 2 or more weeks after a single dose vaccine) do not need to quarantine after exposure to someone with COVID-19 if asymptomatic and may come to work if asymptomatic. The local Health Officer Order requires everyone to self-isolate when sick with COVID-19. It also requires individuals to self-quarantine for 10 days from last contact with someone with COVID-19, unless fully vaccinated. Anyone who is a close contact with someone with COVID-19 must check for symptoms for 14 days regardless of vaccination status. The employee must isolate from others immediately if symptoms develop within 14 days of exposure. Quarantine must be maintained for 10 days, even if test results are negative (no virus detected).



If one or more employees are diagnosed (by a physician or lab test) with COVID-19. They should immediately isolate at home and self-quarantine of everyone that came into contact (within 6 feet for a cumulative total of 15 minutes or more over a 24-hour period, regardless of whether a mask was worn) with the ill employee, except fully vaccinated individuals who are asymptomatic. The plan should also include options for all employees identified as contacts to be tested for COVID-19 with an FDA-approved PCR test (not a blood test) if they are not fully vaccinated. However, contacts must still maintain quarantine for 10 days, even with a negative test, if they are not fully vaccinated.

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. Disinfectant wipes are provided at locations where equipment are shared. Staff are instructed to wipe down the equipment before and after use and expose the wipes in a covered receptacle. Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users

Vehicle Cleaning

Hillsides Vehicles will be cleaned and disinfected after each use by the staff who used it last. Drivers are equipped with disinfectant wipes and disposable gloves to support disinfection of surfaces as needed. The vehicle will be cleaned immediately after use. Staff will disinfect seats, seatbelts, internal and external door handles, the steering wheel, gear shift, parking brake, turn signals, radio, and other controls in the driver cockpit. Vehicles are professionally cleaned with appropriate disinfectants every two weeks on a rotation unless there is an exposure in the vehicle. Any vehicle that has had positive cases will be taken out of service and cleaned and disinfected before it can be used again.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

Hillsides has provided hand sanitizing stations, kitchen, lobby, staff breakrooms and commonly used areas. Hillsides routinely inspects and refills all hand sanitizing stations and soap dispensers.

- Evaluated handwashing facilities.
- Determined the need for additional facilities.
- Encouraging and allowing time for employee handwashing.
- Providing employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- 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 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. When it comes to PPE usage, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained. We provide and ensure use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

Investigating and Responding to COVID-19 Cases

This will be accomplished by using the **Appendix C: Investigating COVID-19 Cases** form.

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

- Offered COVID-19 testing at no cost during their working hours.
- Information regarding COVID Related Concerns and Case will be provided by Hillsides Human Resources Department.

System for Communicating

The Exposure Management Plan will be implemented by Hillsides leadership and the COVID Relief Team immediately upon notification that a member of the school community (faculty, staff, student or visitor) or work force has symptoms consistent with COVID-19 or tests positive for COVID-19. In accordance with the Pasadena Department of Public Health guidelines, Hillsides will initiate an Exposure Management Plan when any student, resident, teacher, staff member tests positive for COVID-19 and has exposed others at the school. This plan covers the identification, tracing, communication, and isolation procedures used to prevent further exposure of COVID-19 cases in the school and any Hillsides program. The COVID Relief Team and Hillsides Leadership will be trained to initiate the following Exposure Management Plan.

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

- That employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Where testing is not required, how employees can access COVID-19 testing, Information is distributed by Hillsides Human Resources Department and Division Chiefs.
- In the event Hillsides Human Resources Department are required will 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.
- Information about COVID-19 hazards employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures.

Training and Instruction

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
 - COVID-19 is an infectious disease that can be spread through the air.
 - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
 - An infectious person may have no symptoms.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility,

and that hand sanitizer does not work if the hands are soiled.

- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- We have an electronic training program called Relias that will track all our trainings.

Exclusion of COVID-19 Cases

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished by following the legal requirements set by the government to provide legal rights and benefits to the employee.
- Providing employees at the time of exclusion with information on available benefits.

Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use the **Appendix C: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
 - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
 - COVID-19 symptoms have improved.
 - At least 10 days have passed since COVID-19 symptoms first appeared.
- COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
- A negative COVID-19 test will not be required for an employee to return to work.
- If an order to isolate or quarantine an employee is issued by a local or state health official, the



employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.

Diana Beuhler- Chief Administrative Officer Signature: *D Beuhler* Date: 5-21-21

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, 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:

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



Hillsides

CREATING LASTING CHANGE

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:

Name of person conducting the inspection:

Work location evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions in reception lobby areas.			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration. Air purifiers that are installed. The filters will be checked and replaced monthly.			
HAVC filters are being replaced monthly with MERS 13 filters.			
We purchased HEPPA vacuum cleaners. Filters are checked and changed regularly.			
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			
Clorox wipes are main available for common use areas.			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Gowns are provided as needed			



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, client and student medical records will also be kept confidential and not disclosed or reported without their 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:

Name of person conducting the investigation:

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 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 14-day period.

COVID-19 testing

- We will provide COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period. COVID-19 testing will be provided at no cost to employees during employees' working hours.
- COVID-19 testing consists of the following:
 - All employees in our exposed workplace will be immediately tested and then tested again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by, the local health department.
 - After the first two COVID-19 tests, we will continue to provide COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
 - We will provide additional testing when deemed necessary by Cal/OSHA.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria** requirements, and local health officer orders if applicable.

Investigation of workplace COVID-19 illness

We will immediately investigate and determine possible workplace-related factors that contributed to the COVID-19 outbreak in accordance with our CPP **Investigating and Responding to COVID-19 Cases**.

COVID-19 investigation, review and hazard correction

In addition to our CPP **Identification and Evaluation of COVID-19 Hazards** and **Correction of COVID-19 Hazards**, we will immediately perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19.

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
 - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
 - Our COVID-19 testing policies.
 - Insufficient outdoor air.
 - Insufficient air filtration.
 - Lack of physical distancing.
- Updating the review:
 - Every thirty days that the outbreak continues.
 - In response to new information or to new or previously unrecognized COVID-19 hazards.



- When otherwise necessary.
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We will consider:
 - Moving indoor tasks outdoors or having them performed remotely.
 - Increasing outdoor air supply when work is done indoors.
 - Improving air filtration.
 - Increasing physical distancing as much as possible.
 - Respiratory protection.
 - [describe other applicable controls].

Notifications to the local health department

- Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in our workplace, we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- We will provide to the local health department the total number of COVID-19 cases and for each COVID-19 case, the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and North American Industry Classification System code of the workplace of the COVID-19 case, and any other information requested by the local health department. We will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace.



Additional Consideration #2

Major COVID-19 Outbreaks

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

COVID-19 testing

We will provide twice a week COVID-19 testing, or more frequently if recommended by the local health department, to all employees present at our exposed workplace during the relevant 30-day period(s) and who remain at the workplace. COVID-19 testing will be provided at no cost to employees during employees' working hours.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees with COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria**, and any relevant local health department orders.

Investigation of workplace COVID-19 illnesses

We will comply with the requirements of our CPP **Investigating and Responding to COVID-19 Cases**.

COVID-19 hazard correction

In addition to the requirements of our CPP **Correction of COVID-19 Hazards**, we will take the following actions:

- In buildings or structures with mechanical ventilation, we will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, we will use filters with the highest compatible filtering efficiency. We will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems would reduce the risk of transmission and implement their use to the degree feasible.
- We will determine the need for a respiratory protection program or changes to an existing respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- We will evaluate whether to halt some or all operations at our workplace until COVID-19 hazards have been corrected
- Implement any other control measures deemed necessary by Cal/OSHA.

Notifications to the local health department

We will comply with the requirements of our **Multiple COVID-19 Infections** and **COVID-19 Outbreaks-Notifications to the Local Health Department**.