New Los Angeles Charter Schools
Model COVID-19 Prevention Program (CPP)

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)).

The following Cal/OSHA template has been used to develop the New Los Angeles Charter Schools plan. Additional support documents and information specific to COVID-19 Safety Prevention Program are available upon request.

1. Authority and Responsibility
2. Identification and Evaluation of COVID-19 Hazards
3. Correction of COVID-19 Hazards
4. Control of COVID-19 Hazards
5. Investigating and Responding to COVID-19 Cases
6. System for Communicating
7. Training and Instruction
8. Exclusion of COVID-19 Cases
9. Reporting, Recordkeeping, and Access
10. Return to Work Criteria

Appendix-A	Identification of COVID-19 / Contact Tracing Tool
Appendix-B	COVID-19 Inspections Form
Appendix-C	Symptoms of Illness Notification
Appendix-D	Close Contact Exposure Notification



January 2021

COVID-19 Prevention Program (CPP) for New Los Angeles Charter Schools

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

Date: January 27, 2021

Authority and Responsibility

Brooke Rios (Executive Director), Xochitl Lira (Director of Operations), Sylvia Barragan (Assistant Director of Operations), Doris Velasquez (Site Manager), Silvana Medina (Office Manager) have overall authority and/or 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/training

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by participating in safety meetings and/or directly speaking with the Director of Operations/Assistant Director of Operations. In addition, employee training is conducted and feedback is encouraged.

Employee screening

We screen our employees using the following protocol:

1. Before coming to campus, employees must complete the Employee Screening Survey.
2. If you clear the screening survey, you may come to campus.
3. If you do not clear screening, you must remain home and follow home isolation or quarantine instructions.
4. All employees must enter through the school's main office. **Do not go directly to classrooms without your temperature being checked.**
5. Employees must have a mask on prior to entering the building.
6. Office staff will utilize a touch free thermometer to take employee's temperature upon entering the building.
7. If your temperature is 100.4 or higher, you will not be allowed to enter the building.
8. If your temperature is 100.3 or below, you will be allowed in the building.

9. Immediately after having your temperature taken you must sanitize or wash your hands before proceeding to your classroom.

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:

The severity of the hazard will be assessed by the Director of Operations/Assistant Director of Operations. If a hazard is found, the area will be immediately closed and a staff member will be assigned to correct the hazard within 24 hours or less (if possible). If the hazard cannot be corrected within that time frame, the area will remain closed until correction is made. The assigned staff member will update the Director of Operations or Assistant Director once the hazard has been cleared or by the end of the day.

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:

New LA Charter Schools have adopted physical distancing plans throughout the school to ensure that students and employees are at least 4-6 feet apart at all times. These methods include:

- Eliminating the need for workers to be in the workplace – e.g., telework or other remote work arrangements.
- Reducing the number of persons in an area at one time, including visitors.
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Staggered arrival, departure, work, and break times are scheduled to ensure physical distancing in break rooms.
- Adjusted work desks to allow for 6 feet of distance between employees.
- Maximum room capacity signs are posted.
- Chairs or desks are clearly labeled where students and/or employees may not sit.

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].

New LA Charter Schools require that face coverings are worn at all times. Disposable face coverings are available in the front office for anyone entering the building. Face coverings are also available in each classroom and office in the event someone needs one for any reason. Employees are trained on face mask requirements before coming to the site. There are posters throughout the facility to remind all employees that masks are required and should be worn at all times. If an employee is seen without a mask an administrator will address the employee immediately and request that he/she puts on a mask.

Finally, all employees are also provided with a face shield.

The following are exceptions to the use of face coverings in our workplace:

- 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.

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

Engineering controls

We implement the following measures for situations where we cannot maintain at least six feet between individuals:

1. Plexiglass dividers will be used when employees are unable to maintain 6 ft of distance between themselves and students.
2. Plexiglass will be installed in the front office.

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

1. New LA Charter Schools has incorporated air purifiers in their ventilation system.
2. The system is maintained quarterly or as needed.
3. Air conditioning will remain on throughout the day.
4. Doors will remain open at all times.

Cleaning and disinfecting

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

1. To minimize and slow the spread of COVID-19 and other infectious diseases school sites will be cleaned and disinfected regularly.
2. The Six Steps for Properly Cleaning and Disinfecting your School will be followed by each employee to safely and effectively reduce the spread of the disease in the school.
3. Teachers will be provided with Cleaning and Disinfecting Classrooms brochure to reduce the spread of germs in the classroom by keeping surfaces clean and reminding students of the importance of hand hygiene.

What are considered high touch areas? Door knobs, tables, light switches, countertops, handles, desks, phones, keyboards, computers, restrooms, faucets and sinks, microwave buttons, refrigerator handles, elevator buttons.

Site Managers oversee inventory of supplies in order to make the necessary purchases as needed with enough time for them to be delivered.

A cleaning schedule of high touch areas is shared with employees and adjusted as needed. Cleaning is done at a minimum 3 times a day and disinfecting is conducted at night.

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

1. Isolate the positive person in the designated room/area.
2. Close areas where the positive person was.
3. If possible exposure, custodians will wear appropriate PPE before and after cleaning and disinfecting the area.
4. A confirmed positive case, the area will be immediately closed and a vendor will be contacted to disinfect the area that evening.
5. Area will remain closed for 24 hours or until LACDH clears the school to reopen.

Shared tools, equipment and personal protective equipment (PPE)

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

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by custodian and employee before and after use. Employees will be provided with disinfecting wipes at all times and be trained on the importance of using gloves, washing their hands after or using hand sanitizer.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we have implemented the following:

- Hand sanitizing dispensers have been installed in every classroom.
- Dispensers are frequently checked and replenished.
- Sinks are regularly checked to ensure that they are working properly.
- Schedule was created to allow for handwashing.
- Hand washing procedure posters are located in all restrooms to encourage 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 respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained. **[reference section 3205(c)(E) for details on required respirator and eye protection use.]**

Investigating and Responding to COVID-19 Cases

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

The following procedures will be followed when a positive case has entered the workplace:

CONFIRMED CASE HAS ENTERED SCHOOL

- Compliance Task Force isolates case in designated room
- Compliance Task Force instructs the case to follow Home Isolation Instructions
- Compliance Task Force informs case that DPH will contact the case directly through the DPH Case & Contact Investigation Program to collect additional information & issue the Health Officer Order for Case Isolation.
- Compliance Task Force will work with the case to generate a list and complete the COVID-19 Case and Contact Line List of students and/or employees with exposure to the case while infectious.
    - A case is considered to be infectious from 2 days before their symptoms first appeared until the time they are no longer required to be isolated (i.e., no fever for at least 24

hours, without the use of medicine that reduce fevers AND other symptoms have improved AND at least 10 days have passed since symptoms first appeared). A person with a positive COVID-19 test but no symptoms is considered to be infectious from 2 days before their test was taken until 10 days after their test.
    - A person is considered to have been exposed if they are one of the following:
        - An individual who was within 6 feet of the infected person for more than 15 minutes, even if a non-medical face covering was worn;
        - An individual who had unprotected contact with the infected person's body fluids and/or secretions of a person with confirmed or suspected COVID-19 (e.g., being coughed or sneezed on, sharing utensils or saliva, or providing care without using appropriate protective equipment).
- School Compliance Officer submits the COVID-19 Case and Contact Line List for the Educational Sector within 1 business day of notification of a case. If needed, additional time may be requested. For technical assistance on how to complete the line list contact: ACDC-Education@ph.lacounty .gov
- Students and employees that are identified to have had an exposure to the case at school are notified by the School Compliance Task Force of the exposure through either a General Notification Letter or an Exposure Letter.
- School Compliance Task Force will determine whether additional notification is needed to inform the wider school community about the school exposure and precautions being taken to prevent spread of COVID-19.

In addition, New LA Charter Schools has contracted with an outside vendor to administer COVID-19 testing to employees and students on a regular basis. Testing will be conducted at no cost during work hours. The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to them.

System for Communicating

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

- Employees should report COVID-19 symptoms and possible hazards to their direct supervisor and Director of Operations/Assistant Director of Operations.
- Employees can report symptoms and hazards without fear of reprisal.
- Employees with medical or other conditions that put them at increased risk of severe COVID-19 illness should contact the Director of Operations to begin the interactive process.
- Employer contracted with a vendor to provide free COVID-19 testing to all employees.
- In the event of an outbreak the employer will schedule vendor to immediately conduct testing to all employees and students.
- Anyone who has contact with a positive case will be notified accordingly.
- Anyone entering the building will be required to wear a mask, maintain social distancing, and clear our COVID-19 symptoms check.

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.

Appendix D: COVID-19 Training Roster will be used to document this training.

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 providing employee sick leave benefits or any available COVID-19 sick time provided by the state.
- 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 cleared.
  - 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.

Brooke Rios, Executive Director **Date**

Appendix A: Identification of COVID-19 Hazards

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

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

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

Date: **XXXX**

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)]**

COVID-19 Case Investigation Information

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):	

<table>
<tr><td colspan="4">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:</td></tr>
<tr><td rowspan="2">All employees who may have had COVID-19 exposure and their authorized representatives.</td><td>Date:</td><td colspan="2"></td></tr>
<tr><td>Names of employees that were notified:</td><td colspan="2"></td></tr>
<tr><td rowspan="2">Independent contractors and other employers present at the workplace during the high-risk exposure period.</td><td>Date:</td><td colspan="2"></td></tr>
<tr><td>Names of individuals that were notified:</td><td colspan="2"></td></tr>
<tr><td>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</td><td></td><td>What could be done to reduce exposure to COVID-19?</td><td></td></tr>
<tr><td>Was local health department notified?</td><td></td><td>Date:</td><td></td></tr>
</table>

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

Appendix D: COVID-19 Training Roster

Date: [enter date]

Person that conducted the training: [enter name(s)]

Employee Name	Signature

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

1 CASE	● CONFIRMED CASE HAS ENTERED SCHOOL ● Compliance Task Force isolates case in designated room WHERE AT ES?? DOES BH HAVE ONE WE CAN USE? ● Compliance Task Force instructs the case to follow Home Isolation Instructions ● Compliance Task Force informs case that DPH will contact the case directly through the DPH Case & Contact Investigation Program to collect additional information & issue the Health Officer Order for Case Isolation. ● Compliance Task Force will work with the case to generate a list and complete the COVID-19 Case and Contact Line List of students and/or employees with exposure to the case while infectious. ○ A case is considered to be infectious from 2 days before their symptoms first appeared until the time they are no longer required to be isolated (i.e., no fever for at least 24 hours, without the use of medicine that reduce fevers AND other symptoms have improved AND at least 10 days have passed since symptoms first appeared). A person with a positive COVID-19 test but no symptoms is considered to be infectious from 2 days before their test was taken until 10 days after their test. ○ A person is considered to have been exposed if they are one of the following: ■ An individual who was within 6 feet of the infected person for more than 15 minutes, even if a non-medical face covering was worn; ■ An individual who had unprotected contact with the infected person's body fluids and/or secretions of a person with confirmed or suspected COVID-19 (e.g., being coughed or sneezed on, sharing utensils or saliva, or providing care without using appropriate protective equipment). ● School Compliance Officer submits the COVID-19 Case and Contact Line List for the Educational Sector within 1 business day of notification of a case. If needed, additional time may be requested. For technical assistance on how to complete the line list contact: ACDC- Education@ph.lacounty .gov ● Students and employees that are identified to have had an exposure to the case at school are notified by the School Compliance Task Force of the exposure through either a General Notification Letter or an Exposure Letter. ● School Compliance Task Force will determine whether additional notification is needed to inform the wider school community about the school exposure and precautions being taken to prevent spread of COVID-19.
2 CASES WITHIN A 14 DAY PERIOD	● Follow steps for 1 confirmed case. ● School Compliance Task Force determines whether 2 individuals affected were both present at some point in the same setting during the same time period while either or both were infectious. ○ A case is considered to be infectious from 2 days before their symptoms first appeared until the time they are no longer required to be isolated (i.e., no fever for at least 24 hours, without the use of medicine that reduce fevers AND other symptoms have improved AND at least 10 days have passed since symptoms first appeared). A person with a positive COVID-19 test but no symptoms is considered to be infectious from 2 days before their test was taken until 10 days after their test. ○ If links do not exist, the school continues with routine exposure management. ○ If link exists, the school reinforces messages to students and employees on precautions to take to prevent spread at the school.
3 OR MORE CASES WITHIN 1 14-DAY PERIOD	● Report cluster to the DPH Acute Communicable Disease Control (ACDC) Education Sector Team within 1 business day via email at ACDC-Education@ph.lacounty.gov or by calling 888-397-3993 or 213-240-7821. ● Complete COVID-19 Case and Contact Line List and submit it to ACDC-Education@ph.lacounty.gov. For technical assistance on how to complete the line list contact ACDC-Education@ph.lacounty.gov. ● The ACDC Education Sector Team will review the Line List for Cases and Contacts to determine whether the outbreak criteria have been met. The ACDC team will contact the school within 1

	business day to advise on next steps. ● If outbreak criteria are not met, the school continues with routine exposure management. ● If outbreak criteria are met, the DPH Outbreak Management Branch (OMB) is activated. ● An OMB public health investigator is assigned to coordinate with the school on outbreak management during the duration of the outbreak investigation. ● School Compliance Task Force will submit requested information, including updates to the Line List for Cases and Contacts, to the OMB investigator until the outbreak is resolved (at least 14 days since the last confirmed case). ● To assist in determining whether there are links in the cases the COVID-19 Exposure Investigation Worksheet for the Education Sector may be used.

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.