

# **COVID-19 Prevention Program (CPP)**

## **LCFEF Summer School (grades 7-12)**

**May 24, 2021**

### **Authority and Responsibility**

The LCFEF Governing Board and the Principal have overall authority and responsibility for implementing the provisions of this CPP in our workplace. This includes ensuring employees, students and families receive answers to questions about the program.

All employees are responsible for using safe work practices, following all directives, policies and procedures, and assisting in maintaining a safe work environment. Protocols can also be referenced for COVID-19 practices and are posted at each site.

### **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**

Staff are reminded through daily screening, signage, and notification letters about the best practices for avoiding COVID-19. The Principal will work to encourage staff awareness of hazards and how to report concerns.

### **Employee screening**

Employee screenings are conducted before employees may enter the workspace. Checks must include a check-in concerning cough, shortness of breath, difficulty breathing and fever or chills and if the employee has had contact with a person known to be infected COVID-19 in the last 14 days.

These checks will be done remotely or in person upon the employees' arrival. A temperature check will be done at the worksite.

Students coming to campus must go through the same entry screening procedures to verify they do not have symptoms.

### **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 LCFEF Summer School COVID Compliance Team in consultation with LA DPH as necessary.
- Time frames to correct the hazard(s) will be assigned.
- Individuals will be identified as being responsible for timely correction.
- Follow-up measures are taken to ensure timely correction.

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

### **Physical Distancing**

Measures are in place to permit physical distancing in administrative and work areas of the school.

- Signage alerts staff, students and visitors of the need to maintain a 6-foot distance from others.
- Tape and/or other markings are used to define a 6-foot radius around reception desks or counters.
- Workstations of administrative personnel have been arranged to permit 6 feet between individuals sharing a space or between office personnel and students or other staff required to visit the space.

Measures are in place to ensure physical distancing within classrooms. These include the following requirements:

A cohorting approach has been adopted school-wide, maintaining a stable group children and adults in a supervised environment in which supervising adults and children stay together for all activities, and avoid contact with people outside of their group in the setting, throughout the school day. Cohort sizes are determined by directives from local DPH.

- In-person class size has been limited to local DPH guidelines students in middle and high school grade
- Alternative spaces are used to reduce the number of students within classrooms. These may include:
  - School library
  - Gymnasium
  - Other: Outdoor spaces whenever feasible

Classroom furniture is set up to ensure 3-6 feet between students at their desks/tables and 6 feet between students and teachers (placement of desks/tables, use of floor markings to indicate required distance, etc.) to the extent feasible.

- Schedules are adjusted to ensure that only one cohort is moving through common spaces (such as hallways and bathrooms) at a given time.
- School employees are deployed in hallways to assure physical distancing as students enter, go through symptom checks and proceed to classrooms.

Visitors to the school other than parents of enrolled students are limited to those who are essential for the school's operation. Visitors are by appointment only and are pre-registered in a visitor log that includes a visitor's name, phone number and email address. Visitors are instructed to come to their appointments alone.

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.

Measures are in place to ensure use of appropriate face coverings by all staff, students and visitors at all times. These include:

- Staff, parents and students are informed of the requirement for cloth face coverings prior to the start of school and on a regular basis throughout the summer session.
- All students over age 2 are required to wear cloth face coverings at all times while on school property except while eating, drinking or carrying out other activities that may preclude use of face coverings.
- Alternative protective strategies may be adopted to accommodate students who are on Individualized Education or 504 Plans and who cannot use or tolerate cloth face coverings.
- Information is provided to staff, parents and students concerning proper use of cloth face covering including the need to wash cloth face coverings after each day's use.
- Signage at the entry to the school, at the entry to the school office and throughout the school building reinforces this requirement and depicts proper use of cloth face coverings.
- Staff who are deployed at school entry or in hallways or other common areas to reinforce physical distancing also remind students of rules concerning use of cloth face coverings.
- 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.

Staff and students who are alone in closed offices, walled cubicles or other private, enclosed spaces are not required to wear cloth face coverings. Students may also remove cloth face coverings when eating or when wearing a cloth face covering is otherwise impracticable (e.g., while showering, etc.).

### **Engineering controls**

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

- Plexiglass partitions are available and installed for workstations in reception areas, offices and classrooms where physical distancing is not possible at all times.
- Additional PPE is provided in the form of N95 masks, gowns, face shields, gloves, etc.

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

- HVAC systems are set to maximize indoor/outdoor air exchange unless outdoor conditions (recent fire, very high outside temperature, high pollen count, etc.) make this inappropriate.
- Doors and windows are kept open during the school day if feasible and if outdoor conditions make this appropriate.
- Air filters have been upgraded to the highest efficiency possible.
- Filters are replaced 4 times per year.

### **Cleaning and disinfecting**

Routine cleaning schedules have been established to provide cleaning between cohorts, frequent wiping of high touch surfaces, and bathrooms. Work schedules have been modified to provide more staff within the work day. Extra cleaning and disinfecting will be done in areas where people with positive cases of COVID-19 have been present.

Measures are in place to ensure appropriate cleaning and disinfecting of space, surfaces and objects throughout the school. These may include:

- A cleaning and disinfecting schedule has been established in order to avoid both under- and over- use of cleaning products.
- Common areas and frequently touched objects in those areas (tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, elevator switches and buttons, touch screens, printers/copiers, grab bars, and handrails) are disinfected at least daily and more frequently as resources allow using appropriate products (see below).
- Use of shared objects is eliminated wherever possible, for example, water fountains are shut down and individual water bottles are provided as an alternative, high touch playground equipment may be taken out of use and replaced with no-touch playground games, etc.
- Where individualized alternatives are not feasible, for example, in laboratories and art rooms where some equipment may have to be used by multiple students, objects and surfaces are cleaned and disinfected between users.
- Cleaning products that are effective against COVID-19 (these are listed on the Environmental Protection Agency (EPA)-approved list “N”) are used according to product instructions. When EPA-approved disinfectants are not available, alternative disinfectants can be used (for example, 1/3 cup of bleach added to 1 gallon of water, or 70% alcohol solutions). Do not mix bleach or other cleaning and disinfection products together – this causes toxic fumes that may be very dangerous to breathe.
- Custodial and other staff responsible for cleaning and disinfecting school surfaces and objects are trained on manufacturer’s directions, Cal OSHA requirements for safe use and as required by the Healthy Schools Act, as applicable.

Custodial staff and other staff responsible for cleaning and disinfecting are equipped with appropriate personal protective equipment, including gloves, eye protection, respiratory protection and other appropriate protective equipment as required by the product. Measures are in place to ensure all cleaning and disinfecting protocols are followed. These include:

- All cleaning products are kept out of children’s reach and stored in a space with restricted access.
- Ventilation is maximized during cleaning and disinfecting to the extent feasible. If using air conditioning, the setting that brings in fresh air is used.
- Replace and check air filters and filtration systems to ensure optimal air quality.
- Enhanced cleaning of school premises is done when students are not at school with adequate time to let spaces air out before the start of the school day.
- Steps are taken to ensure that all water systems and sinks are safe to use after a prolonged facility shutdown to minimize the risk of Legionnaires’ disease and other diseases associated with water.
- Restrooms, lobbies, break rooms, lounges and other common areas are being disinfected frequently, on the following schedule:
  - Restrooms: 3 times per day
  - Lobbies/entry areas: 3 times per day in public areas
  - Classrooms: Once daily
  - Front office: 3 times per day in public areas

If a positive COVID-19 case is identified, the area(s) where the positive case was present on campus will be closed off until the area(s) is/are thoroughly cleaned and disinfected by site custodial staff. District and site custodial staff have been trained on proper cleaning and disinfecting procedures related to COVID-19.

## **Shared tools, equipment and personal protective equipment (PPE)**

Each employee is assigned their own PPE, tools, supplies, equipment and defined workspace to the extent feasible. Sharing of workspaces and held items is minimized or eliminated.

Disinfectant and related supplies are available to employees at the following location(s): Classrooms, offices, and common areas. Staff can communicate with the Main Office to get access to additional cleaning materials.

Sharing of equipment and supplies is avoided where possible. Should equipment need to be shared, it must be sanitized before and after each use by a different student and/or employee.

Work hours have been modified to increase staffing levels while students and staff are on site.

## **Hand sanitizing**

Hand sanitizer effective against COVID-19 is available to all employees in or near the following locations:

- Building entrance/s, exit/s
- Central office
- Stairway entrances
- Elevator entry (if applicable)
- Classrooms

Soap and water are available to all employees at the following location(s):

- Staff lounge areas, lavatories, and classes with sinks

Measures are in place to ensure frequent hand washing by staff, students and visitors. These must include:

- Students and staff are given frequent opportunities to wash their hands for 20 seconds with soap, rubbing thoroughly after application, and use paper towels (or single-use cloth towels) to dry hands thoroughly. Each cohort is required to use a designated bathroom; should more than one cohort be assigned to use the same bathroom, a coding system is used to minimize students from different cohorts using the bathroom at the same time.
- Portable handwashing stations have been placed near classrooms to minimize movement and congregations in bathrooms to the extent practicable.

Ethyl alcohol-based, hand sanitizer is made available to students and staff at strategic locations throughout the school where there is no sink or portable handwashing station (in or near classrooms, rooms in which support services are provided, music and art rooms). Ethyl alcohol is preferred and should be used when there is the potential of unsupervised use by children. Isopropyl hand sanitizers are more toxic and can be absorbed through the skin.

- Swallowing alcohol-based hand sanitizers can cause alcohol poisoning. Hand sanitizer is not out in the open and should be used with adult supervision for children under age 9. Faculty and staff have been made aware of the risk of ingestion and that they should call Poison Control at 1-800-222-1222 if there is reason to believe that a student has consumed hand sanitizer.
- Hand sanitizer, soap and water, tissues and trash cans are available at or near the entrance of the facility, at reception, and anywhere else inside the workplace or immediately outside where people have direct interactions.

## **Investigating and Responding to COVID-19 Cases**

Our Health and Safety Plan balances the need for personal health privacy and the interest in community awareness of potential exposure. If a potential positive case is identified, the individual is provided information about how and where to get tested and instructed to quarantine until the results are received. The Summer School COVID Compliance Team interviews the individual to gather preliminary contact tracing information. Should any unique circumstances related to the exposure exist, the COVID Compliance Team contacts the Los Angeles Department of Public Health for specific guidance and/or recommendations.

If a positive test result is received, close contacts of the positive case are immediately notified and given direction to quarantine for ten days from the date of their last exposure to the positive case. A general notification is sent to the site within twenty-four hours from when the district is notified about the positive test result.

If a work site is identified by the Los Angeles Department of Public Health (LA DPH) as the location of a COVID-19 outbreak or major outbreak, where there are multiple epidemiologically connected COVID-19 cases within a 14-day period, the district will work with LA DPH to follow the steps outlined in Appendix T2: Exposure Management Plan.

## **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:

Information was sent to employees, parents and students prior to the start of school concerning school policies related to:

- Employees will participate in daily health screenings, through which they shall report symptoms and/or positive COVID-19 test result, and receive direction from the site administrator and/or the LCFEF Summer School COVID Compliance Team.
- Students and parents/guardians were instructed to report symptoms and/or positive COVID-19 test result to the school site office. The site office then contacts the LCFEF Summer School COVID Compliance Team and gives direction to the site and/or parent/guardian regarding quarantine or isolation procedures, depending upon the reported symptoms or positive COVID-19 test result.
- Isolation and quarantine policies as they apply to students who have symptoms or may have been exposed to COVID-19.
- Options for COVID-19 testing if an employee or student has symptoms or has been exposed to COVID-19.
- How to conduct a symptom check before student leaves home.
- Required use of face coverings.
- Importance of compliance with physical distancing and infection control policies.
- Changes in academic and extracurricular programming in order to avert risk.
- Changes in school snack time in order to avert risk.
- School policies concerning parent visits to school and advisability of contacting the school remotely.
- Importance of providing the school with up-to-date emergency contact information including multiple contact options.
- Online outlets instruct students, parents and teachers on how to contact the school in case of infection or exposure.
- Staff were informed by their supervisors to inform the Summer School Principal if they had medical or other conditions that put them at increased risk of severe COVID-19 illness.
- LA DPH Appendix T1 and T2 are posted on the LCFEF Summer School website and available in the office.

Other means of communication have been implemented at the school sites, including, but not limited to the following:

- Signage has been posted throughout the school reminding staff and students of policies concerning physical distancing, use of face coverings, and importance of hand washing.
- Signage is posted at each public entrance of the school informing visitors that they should not enter the facility if they have symptoms of COVID-19.
- The school will use multiple methods of communication to students and families in case a full or partial closure is required due to a possible cluster of COVID-19 cases.
- The initial staff training and professional development will cover potential COVID-19 hazards and what is being done to correct those hazards.

## **Training and Instruction**

In June 2021, staff participated in the following trainings related to COVID-19:

- Coronavirus Awareness
- Coronavirus: CDC Guidelines for Making and Using Cloth Face Coverings
- Coronavirus: Cleaning and Disinfecting Your Workplace
- Handwashing
- Physical Distancing

The LCFEF Summer School communicated to certificated and classified employees the LCFEF Summer School Reopening Plan, Health and Safety Plan, Reopening Protocols and Exposure Management Plan. The Health and Safety Plan includes COVID-19 policies and procedures to protect employees from COVID-19 hazards and instructions as to what to do if an employee has symptoms or receives a positive COVID-19 test result. LCFEF Summer School also communicated health and safety protocols, which included information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws. The plans and MOUs were made available to staff on the district website, at each site location, and through electronic communications from the labor associations.

## **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 10 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 once all applicable and available leaves are exhausted by the employee and whenever the COVID-19 exposure is demonstrated as work related through contact tracing.
- 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.
- 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.
- LCFEF Summer School Dashboard updates COVID cases within program for staff and community to see.

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

- Positive COVID-19 cases with 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.
  - Free of COVID-19 symptoms for at least 24 hours.
  - 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 of isolation was specified, then the period will be 10 days from the time the order to isolate was effective, or 10 days from the time the order to quarantine was effective.

## 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: \_\_\_\_\_

Date: \_\_\_\_\_

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
<b>Engineering</b>			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
<b>Administrative</b>			
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			
<b>PPE (not shared, available and being worn)</b>			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			

## 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 to the local DPH, Cal/OSHA, or as otherwise required by law.

Positive COVID-19 cases are tracked using the County of Los Angeles Department of Public Health [“COVID-19 Case and Contact Line List for Education Sector” spreadsheet](#). The Line List spreadsheet is updated and re-submitted within 24 hours of any newly identified positive COVID-19 cases within the District.

## **Additional Consideration #1**

**We will work with LA DPH if a site is identified with an outbreak. The Exposure Management Plan addresses procedures for the handling of positive cases as determined by the Los Angeles County Department of Public Health.**

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

**This section will need to be added to your CPP if your workplace is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in your workplace within a 14-day period. Reference section [3205.1](#) for details.**

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, our Exposure Management Plan, 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**. We will also work closely with our local health officer for guidance.

### **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. We will communicate with our local health officers regarding any updated recommendations or practices.

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:

- Our leave policies and practices and whether employees are discouraged from remaining home when sick.
- Our COVID-19 testing policies.
- Insufficient outdoor air.
- Insufficient air filtration.
- Lack of physical distancing.
- Updating the review:
  - Every thirty days that the outbreak continues.
  - In response to new information or to new or previously unrecognized COVID-19 hazards.
  - When otherwise necessary.
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We will consider:
  - Moving indoor tasks outdoors or having them performed remotely.
  - Increasing outdoor air supply when work is done indoors.
  - Improving air filtration.
  - Increasing physical distancing as much as possible.
  - Respiratory protection.

### **Notifications to the local health department**

- Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in our workplace, we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace. If the local department of public health has more stringent guidelines, we will adhere to those.
- 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 will need to be added to your CPP should your workplace experience 20 or more COVID-19 cases within a 30-day period. Reference section 3205.2 for details.**

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**.