COVID-19 Prevention Program (CPP) for Para Los Niños

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

**Authority and Responsibility**

*Gabriela Herrera, Covid-19 Compliance Officer* 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:

- 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 by: Emailing the COVID-19 Task Force with suggestions on how to improve a process and/or reporting flaws in an already implemented process.

Employee screening

We screen our employees with a self-passive screening, in accordance with CDPH guidelines.

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: In the event that there are any hazards identified and reported, the Operations Department will assess the severity and set a timeline for the repairs. Notifications to all those at the site will be sent in the event of temporary closures to the site in order to make repairs and or deep sanitizations.

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:

• Maintaining at least six feet distance from each other at all times;
• Employing measures to ease foot traffic during peak hours;
• Occupying workspaces that are at least six feet apart. Wherever possible, workstations and other furniture are arranged to best support physical distancing;
• Minimizing use of shared office supplies, tools, and equipment; and disinfecting all supplies frequently and in between use;
• Implementing and utilizing contactless doors and trash cans wherever possible;
• Being mindful of “traffic jams” and “high-risk areas” where visitors, clients, and staff tend to stand together, such as hallways, stairs, elevators, and break areas- remember to maintain social distance. Visitors and staff may need to stand back and wait for the area to clear;
  o Whenever possible program employees will be asked to be present in hallways as clients enter, exit, and other times throughout the day as needed to assure physical distancing;
• Following guidelines for one-directional hallways and stairwells when applicable to minimize traffic;
• Where lines tend to form on site (e.g., front entrance, stairs, gates, restrooms etc.), tape or other markings have been placed to help maintain a minimum six feet between people;
• No group lunches, co-mingling among other clients, or other joint meals are permitted while this Social Distancing Policy remains in effect, unless you are able to maintain social distancing in open air areas;
• If small groups (within the guidelines) need to meet, do so in an area with adequate space to maintain social distancing and open air if possible;
• Requiring face coverings at all times as they are not a substitute for social distancing;
• Reminding visitors, clients and co-workers of this policy where necessary;
• Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

If you observe any violations of this policy, contact the Site/Program Director or Deanette Brewer in Human Resources immediately.

Please be advised that failure to follow PLN’s Social Distancing Policy may result in disciplinary action.

If you have any questions about any aspect of this policy, please contact Deanette Brewer immediately at 213.250.4800 ext. 508
Face Coverings

We provide clean, undamaged face coverings to each employee and student (and visitors if needed) and ensure they are properly worn 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. In order to comply with the Federal, State and County directives to slow the spread of COVID-19 and to better protect our staff from exposure to COVID-19, PLN has implemented a face covering policy.

Effective immediately and until further notice, all employees, clients over the age of two, and essential visitors are required to wear a face mask at all times when on a PLN site.

PLN has purchased face masks for all employees and students to use in the workplace/school sites. When your personal mask has been forgotten, damaged or lost, you may request a disposable mask to use for the day. These face masks will be distributed to all who request them. You may use your own face covering, if preferred, so long as the use and care guidelines below are followed.

Face Covering Appropriate Use Guidelines

Face coverings are only effective for protection if they are handled, worn, and stored properly. Even when wearing a face covering, clients, staff, visitors and employees are required to maintain social distancing (six feet of space between each person) when possible. Clients Staff, visitors, employees and student trainees are also required to adhere to the following guidelines when wearing a face covering:

- Practice proper hand hygiene. Before and after handling the face covering (to put on, adjust, or take off), either wash your hands or use hand sanitizer to reduce cross-contamination risk. The outside of the face covering is considered dirty;
- To ensure that you are wearing the face covering properly, make sure the face covering is fitted over your ears and is covering your nose, mouth and chin;
- Mark the outside of the face covering in some way so you can easily identify which side is the outside of the face covering and handle it accordingly. Consider marking the outside with your initials in permanent ink;
- Remove the face mask covering while eating during your meal period;
- Do not touch the outside of your face mask while it is on your face;
- Don’t pull your face mask below your chin while you are wearing it. Leaving the face mask dangling or improperly fitted to your face creates opportunities for cross-contamination;
- After removing a face mask, please inspect it to see if it is torn, wet, or soiled
  ✔ If it is, please throw it away and obtain a new face mask from the Office Manager
  ✔ If not, please properly store the face mask as follows:
    § Fold the face mask in half so that the outside surfaces are touching
    § Place the face mask into a clean bag or container
- We recommend you keep a paper bag or plastic zip-lock handy for storing the face covering every time you take it off;
- Always store a face covering in a clean place. Never store it in a backpack, purse, or pocket.

REMEMBER — The use of a face covering is not a substitute for physical distancing, washing hands, and staying home when ill.
Please be advised that failure to follow PLN’s face covering policy may result in disciplinary action.

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.

**Engineering Controls**

We implement the following measures for situations where we cannot maintain at least six feet between individuals: Plexi glass has been installed in all Reception areas and other locations where staff have multiple visitors gather or go to throughout the day. Plexi glass is also used when conducting any type of assessment based on services needed; this includes rolling plexi glass so that it is easily portable. Cubicles are marked off so that every other cubicle is used.

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

- A Commercial HVAC vendor is contracted to complete quarterly Preventative Maintenance to ensure systems are properly maintained and in good repair at all times.

HVAC filters are replaced at minimum on a quarterly basis. Internal service technicians check systems in between scheduled PM service and will replace filters if needed. Fresh air intakes are also maintained and dampers open to ensure air flow is at optimum. We implement the following cleaning and disinfection measures for frequently touched surfaces:

- Use disinfecting solution with one (1) minute dwell time and that is on the EPA list of recommended products to use for COVID-19. Spray bottles with solution will be available in each classroom and in other high-traffic areas for staff to use.
- All PLN school & non-school sites will be equipped with cleaning, sanitation and disinfectant supplies (i.e., hand sanitizer, gloves, sanitizing and disinfectant solutions);
  - Cleaning equipment will be available throughout the sites and at the entrances for staff and visitors;
- All PLN staff will be trained on how to properly clean, sanitize and disinfect work spaces, classroom spaces, high touch areas, and surfaces in accordance with Public Health and CDC recommendations;
- Programs that use manipulatives or other therapeutic materials for therapy are responsible for disinfecting them after every use.
- Cleaning, disinfecting, and sanitizing schedules for sites based on CDC guidelines have been designed.
- Electrostatic sprayers: Sprayers have been procured and are ready for use by the night crews nightly to disinfect sites before the next day of instruction (schools only).
Should we have a positive COVID-19 case in our workplace, we will implement the following procedures:

- Remain calm and objective;
- Isolate the potentially infected client from other individuals while information is being gathered and family is being contacted for pick-up (for students);
- Immediately notify the Program Director/Program Supervisor;
- Program Director/Program Supervisor should then immediately contact the COVID-19 Compliance Task Force;
- Program Director/Program Supervisor and HR will conduct an assessment as follows:
  - Focus on obtaining facts and making factual statements;
  - Gather and document as much information as possible regarding the students/staff/visitors that may have been exposed for contact tracing purposes.
- If a client/staff/visitor is confirmed to have COVID-19, PLN will inform all who may have come in close contact with the individual of their possible exposure to COVID-19 at the site. Confidentiality when sharing this information will always be upheld and no more facts than necessary will be shared;
- If you would like to be tested to confirm your possible exposure, you can make an appointment here: [https://corona-virus.la/covid-19-testing](https://corona-virus.la/covid-19-testing);
- For any suspected or confirmed COVID-19 infections, we will follow CDC and local public health guidance regarding cleaning and disinfection recommendations. [https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/](https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/);
- For confirmed cases of COVID-19, PLN will report it to CDPH, DPH and CalOSHA for recordability and reportability under recordkeeping rules.

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:

- Wearing proper PPE when cleaning, sanitizing with solution spray provided to each site, disinfecting copy machines with disinfectant wipes, wiping light switches thermostats, and high touch surfaces as tables and chairs etc.,
- Sharing of vehicles or carpooling will be highly discouraged at this time. However, in the event that you do require to carpool with a colleague we ask that you follow all PPE and Face Covering policies at all times during the course of your travel.

Hand Sanitizing

- Hand sanitizer dispensers have been installed in or near all entrances to building, stairwells, elevators, biometric clocks, and any classroom that does not have a sink. We prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Setting and following a hand washing schedule for staff and visitors upon arrival, before and after going to the restroom, and regular intervals throughout the day.
- Reminders have been placed near all sinks encouraging employees, visitors, and students 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.

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.
- Encouraged to see their healthcare provider if it is after working hours.
- Receive information on eligibility for leave in accordance with county, state and federal regulations.

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 with the following information:

- Who employees should report COVID-19 symptoms and possible hazards to; employees should email Mayra Flores at mflores@paralosninos.org
- 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; employees can access COVID-19 testing at any local county testing locations or with their healthcare provider.
  - In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible quarantine of a positive test.

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.
• Additional trainings will be provided through our Learning Managing System, Cornerstone.

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 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 whenever we’ve demonstrated that the COVID-19 exposure is work related. This will be accomplished by providing employee paid sick leave benefits in accordance with county, state and federal regulations
• 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 Department of Public Health whenever required by law, and provide any related information requested by the Department of Public Health.
• Report immediately to Cal/OSHA, Department of Public Health, Licensing and other funding entities, 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 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:
  o At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
  o COVID-19 symptoms have improved or you have been cleared by a physician
  o At least 10 days have passed since COVID-19 symptoms first appeared.
• COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
• 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.

Plan Approved by Vice President and Chief Operating Officer
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: [enter date]

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

<table>
<thead>
<tr>
<th>Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards</th>
<th>Places and times</th>
<th>Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers</th>
<th>Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation</th>
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Appendix B: COVID-19 Inspections [www.dir.ca.gov/dosh/coronavirus/](http://www.dir.ca.gov/dosh/coronavirus/)

Date:
Name of person conducting the inspection:
Work location evaluated:

<table>
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<tr>
<th>Exposure Controls</th>
<th>Status</th>
<th>Person Assigned to Correct</th>
<th>Date Corrected</th>
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<tr>
<td><strong>Engineering</strong></td>
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<td>Barriers/partitions</td>
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<tr>
<td>Ventilation (amount of fresh air and filtration maximized)</td>
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<td>Additional room air filtration</td>
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<td><strong>Administrative</strong></td>
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<tr>
<td>Physical distancing</td>
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<tr>
<td>Surface cleaning and disinfection (frequently enough and adequate supplies)</td>
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<td>Hand washing facilities (adequate numbers and supplies)</td>
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<tr>
<td>Disinfecting and hand sanitizing solutions being used according to manufacturer instructions</td>
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<td>Timely Contact Tracing</td>
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<tr>
<td><strong>PPE</strong> (not shared, available and being worn)</td>
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<td>Face coverings (cleaned sufficiently often)</td>
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<td>Gloves</td>
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<td>Face shields/goggles</td>
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<td>Respiratory protection</td>
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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), and Licensing 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, and licensing 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:

<table>
<thead>
<tr>
<th>Employee (or non-employee*) name:</th>
<th>Occupation (if non-employee, why they were in the workplace):</th>
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<tbody>
<tr>
<td>Location where employee worked (or non-employee was present in the workplace):</td>
<td>Date investigation was initiated:</td>
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<tr>
<td>Was COVID-19 test offered?</td>
<td>Name(s) of staff involved in the investigation:</td>
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<td>Date and time the COVID-19 case was last present in the workplace:</td>
<td>Date of the positive or negative test and/or diagnosis:</td>
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<td>Date the case first had one or more COVID-19 symptoms:</td>
<td>Information received regarding COVID-19 test results and onset of symptoms (attach documentation):</td>
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<tr>
<td>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):</td>
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**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:**

<table>
<thead>
<tr>
<th>All employees who may have had COVID-19 exposure and their authorized representatives.</th>
<th>Date:</th>
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<tr>
<td>Names of employees that were notified:</td>
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<tr>
<th>Independent contractors and other employers present at the workplace during the high-risk exposure period.</th>
<th>Date:</th>
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<tr>
<td>Names of individuals that were notified:</td>
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<tr>
<th>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</th>
<th>What could be done to reduce exposure to COVID-19?</th>
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<tr>
<th>Was local health department notified?</th>
<th>Date:</th>
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*Should an employer be made aware of a non-employee infection source COVID-19 status.*
Appendix D: COVID-19 Training Roster

Date:

Person that conducted the training:

<table>
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<tr>
<th>Employee Name</th>
<th>Signature</th>
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Additional Consideration #1

Multiple COVID-19 Infections and/or 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.