

Model COVID-19 Prevention Program (CPP)

With some exceptions, all 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\(c\)](#)). Cal/OSHA has developed this model program to assist employers with creating their own unique CPP tailored to their workplace.

Employers are not required to use this program. Employers may create their own program or use another CPP template. Employers can also create a written CPP by incorporating elements of this program into their existing Injury and Illness Prevention Program (IIPP), if desired. Cal/OSHA encourages employers to engage with employees in the design, implementation and evolution of their COVID-19 Prevention Program.

Using this model alone does not ensure compliance with the emergency temporary standard. To use this model program effectively, the person(s) responsible for implementing the CPP should carefully review:

- All of the elements that may be required in the following CCR, Title 8 sections:
 - [3205, COVID-19 Prevention](#)
 - [3205.1, Multiple COVID-19 Infection and COVID-19 Outbreaks](#)
 - [3205.2, Major COVID-19 Outbreaks](#)
 - [3205.3, Prevention in Employer-Provided Housing](#)
 - [3205.4, COVID-19 Prevention in Employer-Provided Transportation to and from Work](#)
 - The four [Additional Considerations](#) provided at the end of this program to see if they are applicable to your workplace.
- The additional guidance materials available at www.dir.ca.gov/dosh/coronavirus/



November 2020

COVID-19 Prevention Program (CPP) for **Tabernacle of David Christian Academy**

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

Date: February 16, 2021

Authority and Responsibility

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

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

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the **Appendix B: COVID-19 Inspections form** as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.
- **Established a TDCA Safety Committee composed of employees, parents, local doctors, business leaders, & financial partners committed to seeing our school operate in a safe manner. This group has provided input into TDCA's Operations Reopening Plan. This plan was established in response to the guidelines set forth by the California Department of Education, the Center for Disease Control and Prevention, and our local health officials.**

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

- Participate in the TDCA Safety Committee
- Report possible COVID-19 hazards to TDCA Administration & document any ideas to address the hazard
- Est. modifications to classroom & school common areas to mitigate contamination risks or hazards

Employee screening

We screen our employees by:

- Requiring Passive and Active Health Screenings of all personnel entering campus. TDCA requires anyone entering the premises, incl. employees to conduct a Health Screening (complete a questionnaire and have their temperature checked) *before arrival on campus.*

- Passive Screening will be required of all essential personnel and students prior to arriving at school. This will include a temperature check and answering a set of screening questions prior to arrival on-site.
- Active Screening will be required *upon arriving at the school premises* by all essential personnel & students. *Parents are not allowed entry unless they are scheduled as a volunteer on campus.* Active Screening includes confirming that the screening questions have been answered and a temperature check (using a non-contact thermometer https://www.epa.gov/sites/production/files/2020-04/documents/316485-c_reopeningamerica_guidance_4.19_6pm.pdf). All persons, including the screener and those gaining entrance to the facility, are required to wear a face mask during the screening time and while on campus.

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:

- Upon identification of a potential hazard, Judy Chen will conduct an inspection of the identified hazard to determine the following:
 - (1) Level of severity of the hazard & prioritization (as necessary)
 - (2) Create a plan for appropriate corrective action
 - (3) Establish an appropriate time frame in which the corrective action will occur & delegate responsibility, as appropriate
- In addition, Judy Chen will track and provide oversight of the corrective action to occur to ensure that the hazard is addressed appropriately.

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:

- Only essential personnel (ie. staff, TAs, Classroom Assistants, etc.) and students will be allowed on campus to limit exposure
 - Parents and guardians will not be allowed to enter the school building unless approved by administration. Parents and guardians approved by administration to enter the building will present their Family ID card and are required to have a Health Screening (complete a questionnaire and have their temperature checked) before entry.
- Drop-off & Pick-up process have been modified to limit unnecessary exposure of personnel or students to those outside of their household
- Increased visual social distancing markers and health & safety signage implemented throughout campus
- Established New foot traffic patterns to limit congestion in hallways and minimize unnecessary contact by staff and students.
- Modified processes and extended times for Drop-off/Pick-up to increase safety measures and limit unnecessary contact
- Adjustments to recess/lunch/gym schedules implemented to help limit exposure & mixing of classes
 - Students will eat their snacks and lunches at their desk prior to heading downstairs to play in the gym and outdoor area.
 - We will have staggered recesses and lunches and limit intermingling between “classroom family units” by utilizing both the indoor gym and outdoor space during play time.
 - Play areas will be marked off to remind students to stay and play within their “classroom family unit” in a socially distant manner.

- Classroom layouts modified for appropriate social distancing measures
- Snacks and meals will be eaten in classrooms (at student desks) before students are taken to the gym for staggered recess/lunch break
- Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.
- Limiting classroom “family unit” mixing as much as possible to mitigate risk of infection, including implementing staggered recess/lunch times
- Limiting use of common areas to mitigate risk of contact exposure
- Morning assembly live-streamed from assembly hall and broadcasted into classrooms each morning when physical distancing cannot be maintained.
- Elective options normally conducted in smaller spaces during afternoon hours may be modified to accommodate new health & safety measures (ie. relocated, canceled or offered through online/hybrid courses); additionally, optional early dismissal may be implemented if the afternoon elective schedule is modified
- Encouraging staff who are at higher risk or who can conduct regular duties from home to work remotely
- In-person community gatherings may be postponed when physical distancing cannot be maintained.

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.

- Use of cloth face masks by staff & students to prevent spread of respiratory illnesses is required.
- Provision of Face Masks: Parents will need to provide cloth face masks that are adequately sized and fitted for their student. TDCA will also have extra face coverings on hand, should a student’s become damaged. TDCA encourages staff to provide their own cloth face coverings, but will provide adequate supply of masks in both adult and child sizes for when additional ones are needed.
- Cleaning of Face Masks: Frequent washing of cloth face masks in accordance with [CDC guidelines](#) is recommended.
- Should an employee encounter a non-employee that is not wearing a face covering on campus, the employee will stop the person and request they wear one. If the person does not have one, TDCA will provide one to them. If the person refused to comply, they will be asked to leave the campus and return when they are willing to abide by the school’s policy.

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 wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- 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. In such cases, the use of face shields & social distancing will be encouraged.
- Students and staff may be encouraged to wear a face shield, rather than a face mask when classroom instruction is taking place and facial cues are important for the learning process (ie. learning pronunciation). In such cases, physical social distancing will be observed.
- For students and staff who have trouble breathing (ie. asthma) or are unable to remove the face mask without assistance. In such cases, the use of face shields & social distancing will be encouraged.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept

at least six feet apart.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, 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:

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

- To the greatest extent possible, ventilation will be increased by allowing windows to remain open during classroom instruction to ensure fresh air is circulating within classrooms
- Using air purifiers w/ Hepa in each classroom; implementing “fresh air breaks” outside throughout the day
- 2 Box fans- one without a filter near the window and one with a Merve 13 filter in the classroom
- Each teacher has a protective shield divider on their desk
- All student desks are arranged to accommodate 6 ft social distancing
- Assembly Hall has been turned into a socially distanced small group instruction area with dividers in between each person (an anchored shield in between students)

Cleaning and disinfecting

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

- Ensuring adequate supplies and adequate time for it to be done properly.
- Informing the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection, [as outlined in the Cleaning & Disinfection Schedule](#)
- [Increased cleaning/disinfecting measures on campus throughout the week, including frequently cleaning/disinfecting frequently touched surfaces throughout the day and deep cleaning of campus twice/week](#)
- [Implementation of a Cleaning Schedule for classroom disinfection and regularly trafficked areas: Regular cleaning/disinfecting schedules will be implemented with special emphasis on frequently touched surfaces.](#)
 - [Ie. Gym and toy equipment will be modified to include items that can easily be disinfected between each recess and lunch break.](#)
 - [Ie. Students will have their own basket of classroom library books that they will use the entire week. These personal classroom library books will then be collected at the end of the week to be disinfected before distributing new books for the following week.](#)
 - [Within classrooms:](#)
 - [Efforts will be made within classrooms to reduce the need to touch objects/doors unnecessarily.](#)
 - [Hand sanitizer and cleaning/disinfecting wipes will be available in each classroom for use, as needed.](#)
 - [All equipment used within the classroom, as well as high touch surface areas \(including desks, chairs, etc.\) will be cleaned/disinfected at the end of the school day using an EPA-approved method.](#)

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

- [Immediately upon notification of a COVID-19 exposure on school property, TDCA employees will clean and disinfect all classroom and common areas in accordance with the Cleaning & Disinfecting Schedule immediately, and in the least disruptive way to normal school operations](#)

- Cleaning will follow the [EPA Guidance for Cleaning & Disinfecting Public Spaces](#) (ie. 1/3 cup of bleach added to 1 gallon of water, or 70% alcohol solutions are an approved alternative)
- As a follow-up protocol, an outside professional service will be utilized to deep clean following any COVID-19 exposure.

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

- Utilizing Clorox wipes or the CDC approved bleach solution

In addition, TDCA will implement the following:

- TDCA will provide individual staff with their own protective gloves, masks, face shields
- Each employee has their own personal equipment for use in their role
- If items have to be shared, like the microwave or copy machine, the items will be wiped down with Clorox wiped immediately after use by the individual
- Restrictions implemented on what students can/cannot bring to school

Hand sanitizing

In order to implement effective hand sanitizing procedures, we will:

- Evaluating handwashing facilities.
- Determining the need for additional facilities, [including portable hand-washing stations](#)
- Encouraging and allowing time for employee handwashing.
- Providing employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Encouraging employees to wash their hands for at least 20 seconds each time.
- “Keeping our Families & Community Safe” program includes training students on personal space (social distancing), proper hand-washing techniques, proper handling/wearing of masks & other health/safety preventative methods
- Increased hand hygiene, including student hand-washing at designated times throughout the day/hand sanitizer available in classrooms and common areas
- Increased signage around campus to remind students/staff about proper hand hygiene, value of wearing masks, and social distancing to help keep ourselves and each other safe

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.

We provide and ensure use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

Investigating and Responding to COVID-19 Cases

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

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

- Offered COVID-19 testing at no cost during their working hours.
 - TDCa employees, staff and students can be tested for free by finding a location offering testing by the Pasadena Health Department: <https://www.cityofpasadena.net/public-health/covid-19-testing-info/>
- TDCa will continue to pay employees the normal 3-day sick days and provide an additional 3 days of COVID sick pay during their 14-day quarantine period, if necessary. If the employee has already used a portion of their normal 3-day sick pay, TDCa will pay for the remaining days they have not used and also pay the additional 3 days of COVID sick pay. **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:

- Who employees should report COVID-19 symptoms and possible hazards to, and how
 - Employees should report possible hazards to Judy Chen, Principal via email or phone call.
- That employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Where testing is not required, how employees can access COVID-19 testing
 - TDCa employees, staff and students can be tested for free by finding a location offering testing by the Pasadena Health Department: <https://www.cityofpasadena.net/public-health/covid-19-testing-info/>
- 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 consequences of a positive test.
 - TDCa employees, staff and students can be tested for free by finding a location offering testing by the Pasadena Health Department: <https://www.cityofpasadena.net/public-health/covid-19-testing-info/>
 - In order to mitigate the spread of COVID-19 exposure, TDCa would conduct contact tracing and inform anyone who has had exposure that they need to be tested (while guarding the identity of the COVID infected person)
 - In addition to being informed of possible exposure, the employee will be informed of the required quarantine period, if they test positive, before they will be allowed to return to work.
- Information about COVID-19 hazards employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures.
 - Staff communication regarding potential hazards will be communicated via internal communication channels (ie. Slack or text message; followed by formal email communication)
 - Communication with families will occur via Constella, our school-wide communication channel, as well as via email.

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.
- **Training for both staff & students will include:**
 - Proper hand-washing techniques
 - Proper use of face masks (how to put on/take off, wear to avoid exposure to contaminants)
 - For younger students who struggle with wearing the mask, TDCA will encourage families to train in an incremental manner at home so the student gets used to wearing the mask for longer durations of time.
 - Increasing awareness of personal space (social distancing)
 - Positive reinforcement of importance of not touching face, eyes, nose, and mouth, as much as possible

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 **continuing to pay employees the normal 3-day sick days and provide an additional 3 days of COVID sick pay during their 14-day quarantine period, if necessary. If the employee has already used a portion of their normal 3-day sick pay, TDCA will pay for the remaining days they have not used and also pay the additional 3 days of COVID sick pay.**
- Providing employees at the time of exclusion with information on available benefits.

Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.

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

Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
 - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
 - COVID-19 symptoms have improved.
 - At least 10 days have passed since COVID-19 symptoms first appeared.
 - COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
 - A negative COVID-19 test will not be required for an employee to return to work.
 - If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.
-
-



Judy Chen
Principal of TDCA

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: **Judy Chen**

Date: **March 1, 2021**

Name(s) of employee and authorized employee representative that participated:

Jenney Oh (staff); Jenny Kim (staff), Lanna-Marie (staff), Timmy Chen (owner), Jennifer Copenhaver (contractor)

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
Entrances to school building during drop/off-pick-up	Beginning of Day/ End of Day	Possible areas of congestion	Drop-off & Pick-up procedures modified to avoid unnecessary contact & minimize potential hazards. Modified processes for early pick-up to ensure only necessary personnel are in the bldg.
Hallways	All Day	Highly trafficked areas/frequently touched surfaces	Modified traffic patterns (to include one-way traffic) in narrow hallways. Students encouraged to walk single file in the middle of the hallway to avoid touching walls.
Classrooms	All Day	Smaller spaces where increased contact could occur between students and between students/staff	Partitions installed at teacher desks. Student desks re-arranges to ensure 6 ft social distancing Classroom library procedures modified.

			<p>Air purifiers installed in classrooms.</p> <p>Hand sanitizer available and regular cleaning & disinfecting of highly touched surfaces</p>
Assembly Halls	Morning (< ½ hr)	Gathering space for staff/students each morning	<p>Morning assembly will be livestreamed into classrooms.</p> <p>Assembly hall transformed into small group meeting space that includes partitions between students and staff.</p>
Gym	Varies (approx ½ hr increments)	Increased potential for student to student contact during casual moments of play	<p>Gym activities moved to outdoor space as much as possible.</p> <p>Gym times rearranged to ensure minimal mixing of class “family groups”</p> <p>Modified gym equipment to ensure easy disinfecting in between class use.</p>
Elective rooms	Afternoons (<1 hr)	Smaller meeting areas for student courses	Small elective classrooms closed and electives held in larger space in Gym to ensure social distancing, when appropriate.
Bathrooms	All Day	Highly trafficked area	<p>Staggered bathroom times ensured based on staggered transition schedule implemented.</p> <p>Cleaning/Disinfecting schedule in place by staff & contracted housekeeper when students use the facility.</p> <p>Increased signage about proper hand-washing techniques</p>

Appendix B: COVID-19 Inspections

Date: **March 1, 2021**

Name of person conducting the inspection: **Judy Chen**

Work location evaluated: **TDCA Pasadena, 1536 E Washington Blvd., Pasadena, CA 91104**

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions- <i>Teachers desks, small group spaces</i>	In-Process	Timmy Chen	
Ventilation/Air Filtration- <i>Air purifiers (Hepa & MERV 13 filters)</i>	In-Process	Timmy Chen	
Administrative			
Physical distancing- <i>student desks 6 ft apart; new traffic patterns, modified drop-off/pick-up times</i>	Complete	Judy Chen	
Surface cleaning and disinfection <i>Adequate supplies & Cleaning/Disinfecting schedule</i>	Complete	Judy Chen	
Hand washing facilities- <i>Adequate numbers & hand sanitizer supplies</i>	Complete	Judy Chen	
Disinfecting and hand sanitizing solutions- <i>used in accordance w/ CDC guidance & EPA standards</i>	Complete	Judy Chen	
PPE (not shared, available and being worn)	Complete	Judy Chen	
Face coverings - <i>Provided on site for staff & students that need it</i>	Complete	Judy Chen	
Gloves	Complete	Judy Chen	
Face shields/goggles	Complete	Judy Chen	
Respiratory protection	Complete	Judy Chen	

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)]**

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):	

<p>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):</p>	
--	--



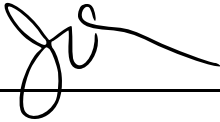
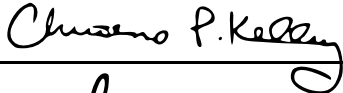
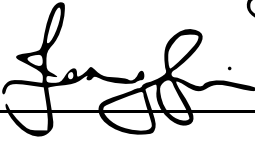




Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:			
All employees who may have had COVID-19 exposure and their authorized representatives.	Date:		
	Names of employees that were notified:		
Independent contractors and other employers present at the workplace during the high-risk exposure period.	Date:		
	Names of individuals that were notified:		
What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?			What could be done to reduce exposure to COVID-19?
Was local health department notified?		Date:	

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

Appendix D: COVID-19 Training Roster

Date: **3/15/21**

Person that conducted the training: **Judy Chen**

Employee Name	Signature
Lanna-Marie Enns	
Anne Wongthavatchai	
Jenney Oh	
Christy Kelley	
Jenny Kim	
Sherri Theimer	
Christa Weddle	
Morgan Robertson	
Courtney Freemyer	

Additional Consideration #1- applicable if 3 or more COVID cases within a 14-day period at TDCA

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, and local health officer orders if applicable.

Investigation of workplace COVID-19 illness

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

COVID-19 investigation, review and hazard correction

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

The investigation and review will be documented and include:

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

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

Notifications to the local health department

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

Additional Consideration #2- applicable if 20+ COVID cases within a 30-day period at TDCA

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**.

Additional Consideration #3- **not applicable to TDCA**

COVID-19 Prevention in Employer-Provided Housing

[This section will need to be added to your CPP if you have workers in employer-provided housing. Reference section [3205.3](#) for details. Employer-provided housing is any place or area of land, any portion of any housing accommodation, or property upon which a housing accommodation is located, consisting of: living quarters, dwelling, boardinghouse, tent, bunkhouse, maintenance-of-way car, mobile home, manufactured home, recreational vehicle, travel trailer, or other housing accommodations. Employer-provided housing includes a “labor camp” as that term is used in title 8 of the California Code of Regulations or other regulations or codes. The employer-provided housing may be maintained in one or more buildings or one or more sites, including hotels and motels, and the premises upon which they are situated, or the area set aside and provided for parking of mobile homes or camping. Employer-provided housing is housing that is arranged for or provided by an employer, other person, or entity to workers, and in some cases to workers and persons in their households, in connection with the worker’s employment, whether or not rent or fees are paid or collected.

- This section does not apply to housing provided for the purpose of emergency response, including firefighting, rescue, and evacuation, and support activities directly aiding response such as utilities, communications, and medical operations, if:
 - The employer is a government entity; or
 - The housing is provided temporarily by a private employer and is necessary to conduct the emergency response operations.
- The requirements below for Physical distancing and controls, Face coverings, Cleaning and disinfecting, Screening, and Isolation of COVID-19 cases and persons with COVID-19 exposure do not apply to occupants, such as family members, who maintained a household together prior to residing in employer-provided housing, but only when no other persons outside the household are present.]

Assignment of housing units

We will ensure that shared housing unit assignments are prioritized in the following order:

- Residents who usually maintain a household together outside of work, such as family members, will be housed in the same housing unit without other persons.
- Residents who work in the same crew or work together at the same worksite will be housed in the same housing unit without other persons.
- Employees who do not usually maintain a common household, work crew, or worksite will be housed in the same housing unit only when no other housing alternatives are possible.

Physical distancing and controls

We will ensure:

- The premises are of sufficient size and layout to permit at least six feet of physical distancing between residents in housing units, common areas, and other areas of the premises.
- Beds are spaced at least six feet apart in all directions and positioned to maximize the distance between sleepers’ heads. For beds positioned next to each other, i.e., side by side, the beds will be arranged so that the head of one bed is next to the foot of the next bed. For beds positioned across from each other, i.e., end to end, the beds will be arranged so that the foot of one bed is closest to the foot of the next bed. Bunk beds will not be used.
- Maximization of the quantity and supply of outdoor air and increase filtration efficiency to the highest level compatible with the existing ventilation system in housing units.

Face coverings

We will provide face coverings to all residents and provide information to residents on when they should be used in accordance with state or local health officer orders or guidance.

Cleaning and disinfection

We will ensure that:

- Housing units, kitchens, bathrooms, and common areas are effectively cleaned and disinfected at least once a day to prevent the spread of COVID-19. Cleaning and disinfecting shall be done in a manner that protects the privacy of residents.
- Unwashed dishes, drinking glasses, cups, eating utensils, and similar items are not shared.

Screening

We will encourage residents to report COVID-19 symptoms to **[enter name of individual, position, or office]**.

COVID-19 testing

We will establish, implement, and maintain effective policies and procedures for COVID-19 testing of occupants who had a COVID-19 exposure, who have COVID-19 symptoms, or as recommended by the local health department.

Isolation of COVID-19 cases and persons with COVID-19 exposure

We will:

- Effectively isolate COVID-19 exposed residents from all other occupants. Effective isolation will include providing COVID-19 exposed residents with a private bathroom, sleeping area, and cooking and eating facility.
- Effectively isolate COVID-19 cases from all occupants who are not COVID-19 cases. Effective isolation will include housing COVID-19 cases only with other COVID-19 cases, and providing COVID-19 case occupants with a sleeping area, bathroom, and cooking and eating facility that is not shared by non-COVID-19-case occupants.
- Keep confidential any personal identifying information regarding COVID-19 cases and persons with COVID-19 symptoms, in accordance with our CPP **Investigating and Responding to COVID-19 Cases**.
- End isolation in accordance with our CPP **Exclusion of COVID-19 Cases and Return to Work Criteria**, and any applicable local or state health officer orders.

Additional Consideration #4- **not applicable to TDCA**

COVID-19 Prevention in Employer-Provided Transportation to and from Work

[This section will need to be added to your CPP if there is employer-provided motor vehicle transportation to and from work, which is any transportation of an employee, during the course and scope of employment, provided, arranged for, or secured by an employer including ride-share vans or shuttle vehicles, car-pools, and private charter buses, regardless of the travel distance or duration involved. Reference section [3205.4](#) for details.]

This section does not apply:

- If the driver and all passengers are from the same household outside of work, such as family members.
- To employer-provided transportation when necessary for emergency response, including firefighting, rescue, and evacuation, and support activities directly aiding response such as utilities, communications and medical operations.]

Assignment of transportation

We will prioritize shared transportation assignments in the following order:

- Employees residing in the same housing unit will be transported in the same vehicle.
- Employees working in the same crew or worksite will be transported in the same vehicle.
- Employees who do not share the same household, work crew or worksite will be transported in the same vehicle only when no other transportation alternatives are possible.

Physical distancing and face coverings

We will ensure that the:

- Physical distancing and face covering requirements of our CPP **Physical Distancing and Face Coverings** are followed for employees waiting for transportation.
- Vehicle operator and any passengers are separated by at least three feet in all directions during the operation of the vehicle, regardless of the vehicle's normal capacity. Vehicle operator and any passengers are provided and wear a face covering in the vehicle as required by our CPP **Face Coverings**.

Screening

We will develop, implement, and maintain effective procedures for screening and excluding drivers and riders with COVID-19 symptoms prior to boarding shared transportation.

Cleaning and disinfecting

We will ensure that:

- All high-contact surfaces (door handles, seatbelt buckles, armrests, etc.) used by passengers are cleaned and disinfected before each trip.
- All high-contact surfaces used by drivers, such as the steering wheel, armrests, seatbelt buckles, door handles and shifter, are cleaned and disinfected between different drivers.
- We provide sanitizing materials, training on how to use them properly, and ensure they are kept in adequate supply.

Ventilation

We will ensure that vehicle windows are kept open, and the ventilation system set to maximize outdoor air and not set to recirculate air. Windows do not have to be kept open if one or more of the following conditions exist:

- The vehicle has functioning air conditioning in use and the outside temperature is greater than 90 degrees Fahrenheit.
- The vehicle has functioning heating in use and the outside temperature is less than 60 degrees Fahrenheit.
- Protection is needed from weather conditions, such as rain or snow.
- The vehicle has a cabin air filter in use and the U.S. EPA Air Quality Index for any pollutant is greater than 100.

Hand hygiene

We will provide hand sanitizer in each vehicle and ensure that all drivers and riders sanitize their hands before entering and exiting the vehicle. Hand sanitizers with methyl alcohol are prohibited.