

COVID-19 Prevention Program for Marshall B. Ketchum University

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COVID-19 PANDEMIC

The novel coronavirus, SARS-CoV-2, causes a viral respiratory illness called COVID-19, which can make people sick with flu-like and other symptoms. The virus spreads easily when an infected person sneezes, coughs, or speaks, sending tiny droplets into the air. These droplets can land in the nose, mouth, or eyes of someone nearby and cause illness. This viral illness can also be caught from airborne virus, when small particles of infectious virus remain suspended in the air and people inhale them. People can also become infected if they touch an infectious virus on a surface and then touch their own nose, mouth, or eyes.

Some of the symptoms of COVID-19 are cough, fever, shortness of breath, and new loss of taste or smell. Some people with mild cases may have no symptoms at all yet still can spread the virus. Avoiding crowded indoor spaces, improving indoor ventilation, staying at least six feet away from people outside of your household, covering your nose and mouth with a face covering, and washing hands often with soap and water can help stop COVID-19 from spreading in the workplace.

COVID-19 PREVENTION PROGRAM

Marshall B. Ketchum University (the “University”) is committed to protecting our employees and preventing the spread of COVID-19 at our workplace. We developed this program to reduce our workers’ risk of catching and spreading this virus. We encourage employees to share information about potential COVID-19 hazards at our workplace and assist in evaluating these hazards. We will investigate all workplace illnesses and correct hazards that are identified. We stay informed on the virus presence in our community as well as recommendations made by national and local health agencies. We review and update this plan as necessary. This plan was last reviewed on 05/09/2022.

The University will endeavor to keep this program plan up to date and based on the latest regulations and guidance. However, even if this plan is not updated, the University will abide by the latest, in effect regulations and guidance notwithstanding the fact that this plan has not been updated.

DESIGNATION OF RESPONSIBILITY

Wende Holtzen, VP for HR, has the authority and responsibility for implementing this plan in our workplace. All managers and supervisors are responsible for implementing this plan in their assigned work areas and ensuring employees' questions are answered in a language they understand.

All employees are required to follow the policies and procedures laid out in this plan, use safe work practices, and assist in maintaining a safe work environment.

IDENTIFICATION AND EVALUATION OF COVID-19 HAZARDS

We evaluate our workplace and operations to identify tasks that may have exposure to COVID-19. The evaluation includes all interactions, areas, activities, processes, equipment, and materials that could present potential exposure to COVID-19. Assessments include employee interactions with all persons who may be present in the workplace: co-workers, contractors, vendors, customers, and members of the public. Evaluations include:

- Identification of places and times when people may gather or come in contact with each other, even if they aren't working. Examples: meetings, trainings, workplace entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting rooms.
- Employees' potential workplace exposure to all persons at the workplace. We will consider how employees and others enter, leave, and travel through the workplace, in addition to addressing stationary work. Examples: co-workers, employees of other businesses, the public, customers or clients, and independent contractors.
- Existing COVID-19 prevention measures and whether we need different or additional control measures.

Employee Participation - We encourage employees to participate in this evaluation. They can contact Human Resources to share information on potential COVID-19 hazards at our workplace or to assist in evaluating these hazards.

We will evaluate how to maximize ventilation with outdoor air for our indoor spaces and the highest level of filtration efficiency that is feasible for our building mechanical ventilation system. We will also evaluate whether the use of portable or mounted HEPA filtration units, or other air cleaners, can additionally reduce the risk of airborne transmission. The California Department of Public Health's ([CDPH](#)) [Interim guidance for Ventilation, Filtration, and Air Quality in Indoor Environments](#) will be used during these evaluations.

Employees may confidentially inform Human Resources if they have a higher risk for severe illness from COVID-19, such as those with conditions like lung disease, obesity, or cancer. They will have priority for lower exposure job assignments or working from home whenever possible.

The jobs/tasks/activities at the University have been assessed as follows:

Table 1 – Risk Assessment

Job Title or Task	Description of Exposure Risk
Faculty teaching	Numerous students in close proximity to each other
Clinic setting	Close contact with numerous people

CORRECTION OF COVID-19 HAZARDS

We treat all persons, regardless of symptoms or negative test results, as potentially infectious. We select and implement [feasible control measures](#) to minimize or eliminate employee exposure to COVID-19. We review orders and guidance on COVID-19 hazards and prevention from the State of California and the local health department, including general information and information specific to our industry, location, and operations. We correct unsafe or unhealthy conditions, work practices, policies, and procedures in a timely manner based on the severity of the hazard.

Table 2 – Controls to Reduce Exposure

Job Title/Task/Work Area	Engineering Controls	Administrative Controls	PPE
Faculty teaching	Numerous students in close proximity to each other	Face coverings required for all employees and students in labs and lectures.	Provide face coverings if requested
Clinic setting	Close contact with numerous people	Face coverings required for all individuals in the clinic setting	Provide face coverings if requested

We inspect periodically to check that controls are effective, to identify unhealthy work conditions or practices, and to ensure compliance with this plan. Any deficiencies are corrected right away, and we update this plan if needed.

Engineering Controls – Equipment and Building Systems to Minimize Exposures

Our engineering controls for COVID-19 include:

- Maximizing outdoor air for ventilation as much as feasible except when EPA’s Air Quality Index is greater than 100 or when increasing outdoor air would cause harm to employees, such as excessive heat or cold.
- Evaluating how to increase filtration efficiency to the highest level compatible with the existing ventilation system.
- Determining if the use of portable or mountable HEPA filtration units, or other air cleaners, would reduce the risk of COVID-19 transmission.

University Campus Facilities installs MERV rated air filters in HVAC systems to improve air filtration in all areas. HVAC systems are electronically controlled and may be adjusted via computer when needed. Campus Facilities maintains a supply of outdoor and indoor circulation fans used to increase ventilation for group gatherings or in spaces where additional ventilation is needed. These fans are installed upon request of Event Services or individual department managers.

Administrative Controls – Policies, Procedures, and Practices to Minimize Exposure

Our administrative controls for COVID-19 are:

- **COVID-19 vaccinations** are effective at preventing severe disease, free, and readily available.
- **Screening Employees and Visitors** to our facility through the following methods:
 - Home Screening - Employees self-screen for COVID symptoms prior to leaving for work.
 - Self-Screening of Visitors - We have a symptom screening form posted at the entrances to our worksite and ask visitors to self-screen before entering the worksite.

We prohibit any employee or visitor sick with COVID-19 from entering the workplace. Anyone exhibiting any potential symptoms of COVID-19 should contact Human Resources and leave the worksite.

- **Wearing a Face Covering:** We provide face coverings to all employees, and ensure they are worn by employees who are not fully vaccinated when indoors or in vehicles, and by all employees when required by orders from CDPH. We will not prevent any employee from wearing a face covering unless it would create a safety hazard, such as interfering with the safe operation of equipment. Face coverings provided will be a surgical mask, medical procedure mask, or cloth/woven material mask of at least two layers that does not allow light to pass through when held up to a light source. Respirators, such as N95’s, can be worn voluntarily. All face coverings must fit snugly, have no holes or openings, completely cover the nose and mouth, and be secured to the head with ties, ear loops, or elastic bands that go behind the head. Gaiters must be folded over or designed to have

two layers of fabric. Clear plastic face coverings for use by deaf/hard-of hearing employees that meet above requirements are allowed. Face coverings must be clean and undamaged. **Face coverings are not respiratory protection against hazardous chemicals or dusts.**

When employees are required to wear a face covering, the following exceptions will apply:

- When an employee is alone in a room or vehicle.
- While eating or drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area has been maximized to the extent feasible.
- When employees are required to wear respirators and in accordance with Section 5144
- When employees cannot wear face coverings due to a medical or mental health condition or disability. This includes a hearing-impaired person or someone using sign language to communicate. Employees exempted from wearing a face covering due to medical conditions, mental health conditions, or disability must wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom that we will provide, if their condition or disability allows.
- When a specific task cannot be performed with a face covering. This exception is limited to the time period in which such tasks are being performed.

Employees not wearing a face covering, face shield with drape, or respirator, for any reason, will stay at least six feet away from all other people in the workplace unless they are fully vaccinated or tested at least weekly for COVID-19 during paid time and at no cost to the employee. We will not use these physical distancing or testing provisions as an alternative to face coverings when they are otherwise required by Section 3205.

Signs are posted at the entrance to the workplace to communicate face coverings requirements for any non-employees entering the workplace. We provide face coverings to members of the public if necessary and instruct employees to remain at least six feet away from members of the public not wearing a face covering.

- ***Practicing Good Hygiene.*** Wash hands with soap and water for at least 20 seconds, or use alcohol-based hand sanitizer with at least 60% alcohol. Hand sanitizer stations and hand hygiene signage are placed throughout the workplace. Campus Operations Department is responsible for ensuring hand hygiene stations are readily accessible and stocked with soap and paper towels, or sanitizer.
- ***Cleaning and Disinfecting Regularly.*** Surfaces, especially frequently touched surfaces, will be cleaned regularly. Disinfectants are used according to manufacturer’s directions. Employees are trained on the hazards of the disinfectants, to use only in well-ventilated areas, any PPE that is required, and to never mix chemicals. Surfaces are cleaned and disinfected according to the following schedule:

Table 3 – Cleaning and Disinfection Practices

Surface/Area	Cleaning and Disinfection Method/Product	Frequency
Restrooms	<ul style="list-style-type: none"> ● Clean, disinfect and shine all washbasins and faucets ● Clean, and disinfect all toilet bowls, both sides of seats, and urinals ● Empty and clean all waste and sanitary napkin disposals ● Damp wipe all partitions 	Daily

	<ul style="list-style-type: none"> • Clean and polish all mirrors, counters, and chrome plumbing • Dust partition tops • Sweep and thoroughly wet mop floors with germicidal deodorant • Restock all paper and soap dispensers 	
Lobby, Waiting Room, Exam Rooms, Labs, Optical, and Consultation Rooms	<ul style="list-style-type: none"> • Damp mop tile areas whenever spills have occurred • Clean all door handles and push bars • Clean all light switches • Clean all wash basins and faucets • Restock all paper and soap dispensers • Vacuum all carpeted areas • Spot clean carpet whenever spills occur • Clean and polish all drinking fountains 	Daily
Lecture Halls and Classrooms	<ul style="list-style-type: none"> • Dust all desks, counters, file cabinets, furniture, bookshelves, and office equipment in offices and lecture halls • Clean whiteboards and trays in classrooms • Vacuum all carpeted areas • Spot clean carpet whenever spills occur • Mop all tiled areas with chemically treated dust mop • Spot clean all glass doors and entry area glass for fingerprints and smudges • Remove kick marks and other marks from walls in hallways • Clean and polish all drinking fountains • Empty all waste receptacles and replace liners as needed 	Daily

	<ul style="list-style-type: none"> • Vacuum elevator cab and polish stainless doors • Clean stairwells, handrails • Vacuum back hallway 	
Offices and Conference Rooms	<ul style="list-style-type: none"> • Dust all desks, counters, file cabinets, furniture, bookshelves, and office equipment in offices • Vacuum all carpeted areas • Spot clean carpet whenever spills occur • Mop all tiled areas with chemically treated dust mop • Spot mop tile areas whenever spills have occurred • Spot clean all glass doors and entry area glass for fingerprints and smudges • Remove kick marks and other marks from vinyl walls in hallways • Clean and polish all drinking fountains • Empty all waste receptacles and replace liners as needed • Vacuum elevator cab and polish stainless steel doors • Vacuum carpeted stairwells 	3xs per week
Lounges and breakrooms	<ul style="list-style-type: none"> • Dust all tables, counters, and furniture • Clean counters, refrigerator fronts, wipe down microwaves and toaster ovens in kitchen areas • Vacuum all carpeted areas • Spot clean carpet whenever spills occur • Damp mop tile areas as needed • Mop all tiled areas with chemically treated dust mop 	Daily

	<ul style="list-style-type: none"> • Spot clean all glass doors and entry area glass for fingerprints and smudges • Remove kick marks and other marks from walls in hallways • Remove heel marks from floor • Clean and polish all drinking fountains • Empty all waste receptacles and replace liners as needed 	
Fitness Center	<ul style="list-style-type: none"> • Dust all desks, counters, file cabinets, furniture, bookshelves, and office equipment in offices • Vacuum all carpeted areas • Spot clean carpet whenever spills occur • Mop all tiled areas with a chemically treated dust mop • Remove kick marks and other marks from walls in hallways • Clean and polish all drinking fountains • Empty all waste receptacles and replace liners as needed • Vacuum elevator cab and polish stainless doors • With disinfectant, wipe down all exercise equipment and exercise mat • Vacuum and disinfect floor in Fitness Center • Restock towels and disinfectant in Fitness Center • Clean and disinfect all shower stalls 	Daily

Personal Protective Equipment (PPE) – Equipment Worn by Employees to Minimize Exposure

In general, employees will not be required to use respirators at the University for protection from COVID-19. If a hazard assessment determines respirators are needed, they will be used in accordance with Title 8, Section 5144. Respirators for voluntary use will be provided upon request in the following situations:

- For all employees working indoors or in vehicles who are not fully vaccinated.

When respirators are provided for voluntary use, we will encourage their use, provide the correct size, train employees how to properly wear the respirator and perform a user seal check, and ensure use is in compliance with Subsection

5144(c)(2), which includes determining that respirator use will not in itself create a hazard and providing employees with [Appendix D](#) to Section 5144.

Any PPE used to protect from COVID-19, such as gowns, face masks, and gloves, is selected based on function, fit, and availability. Employees are trained when and why PPE is necessary, how to properly put on and take off PPE, and how to clean, maintain, and store reusable PPE. Job hazard assessments are performed by supervisors to identify any PPE required for a specific job. Supervisors are responsible for ensuring that adequate supplies of PPE are requested from Auxiliary Services to have on hand for employee and guest needs.

The University provides PPE to students, faculty, staff, patients, and guests at no charge. PPE is sourced through the University's Corporate Purchasing department and managed by Auxiliary Services. Auxiliary Services monitors corporate inventory of PPE and notifies Purchasing when additional supplies are needed. A 60-day supply is maintained of all items. A tote system is established for the transport and restocking of PPE in classrooms, lecture halls, laboratories, lecture halls, student and employee lounges, Gym and all support departments throughout the University. The PPE totes provided to each of the above areas at all campus locations include surgical masks, surgical tape, gloves, alcohol in spray bottles, alcohol prep pads, a box of facial tissue, and two rolls of paper towels and one container of antibacterial wipes.

Totes are inspected and restocked by Auxiliary Services personnel daily, typically first thing in the morning in all areas except support departments. If supplies run low during the day, students or department managers contact Auxiliary Services via email or telephone for replenishment stock and it is delivered within 24 hours. Support Department Managers contact Auxiliary Services to request items needing replacement and they are delivered with mail runs daily or picked up by a member of the department from Auxiliary Services as needed.

COVID-19 Testing

We will make COVID-19 testing available at no cost and during paid time to employees that are not fully vaccinated who have symptoms of COVID-19, and to all employees who have close contact with a COVID-19 case in the workplace, as outlined in the INVESTIGATING AND RESPONDING TO COVID-19 CASES IN THE WORKPLACE section below.

COVID-19 tests will meet all of the following requirements:

- Be cleared, approved, or authorized, including in an Emergency Use Authorization (EUA), by the Food and Drug Administration (FDA) to detect current infection with the SARS-CoV-2 virus
- Be administered in accordance with the authorized instructions
- Not be both self-administered and self-read unless observed by Dr. Brandon Grove, Chief Medical Officer, or an authorized telehealth proctor, or a time-stamped photo of the test result is provided to Human Resources.

INVESTIGATING AND RESPONDING TO COVID-19 CASES IN THE WORKPLACE

Illness at the Workplace

We investigate all COVID-19 cases in the workplace. Our investigation includes seeking information from employees on COVID-19 cases and close contacts, obtaining information on COVID-19 test results and symptom onset, identifying and recording COVID-19 cases, and reporting when required by the regulations.

We will not reveal any personally identifiable information or employee medical information to any person or entity unless required by law (such as Cal/OSHA, local health department, and local law enforcement).

Notification

Employees must alert Human Resources if they are having symptoms of COVID-19, had close contact with a COVID-19 case, were diagnosed with COVID-19, or are awaiting test results. We do not discriminate or retaliate against employees for reporting positive test results or symptoms.

Following notification of a positive test/diagnosis, we will immediately take the following actions:

1. Determine the day and time the COVID-19 case was last present at the workplace, the date of the positive test/diagnosis, and the date the COVID-19 case first experienced symptoms.
2. Determine who may have had close contact with the COVID-19 case by reviewing the case's activities during the high-risk period. The high-risk period **for persons who develop symptoms** is from two days before they first develop symptoms until 10 days after symptoms first appeared and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved. The high-risk period **for persons who test positive but never develop symptoms** is from two days before until 10 days after their first positive test for COVID-19 was collected.
3. Within one business day of knowing, or should have known, of a positive test/diagnosis, Human Resources will provide written notification to all employees, independent contractors, and other employers who were on the premises at the same worksite during the high-risk exposure period, that they may have been exposed (without identifying the infected person/s). The written notification will be readily understandable by employees and sent in a typical manner used for employment-related communication. We will verbally inform employees who have limited literacy in the language of the written notice, or those the employer should reasonably know have not received the written notice.
4. Within one business day of knowing, or should have known, of a positive test/diagnosis, Human Resources will provide notice required by Labor Code section 6409.6(a)(2) and (c) to the authorized representative of the COVID-19 case and of any employee who had close contact. Notice required by Labor Code section 6409.6(a)(4) will be provided within one business day to the authorized representative of any employee on the premises at the same worksite as the COVID-19 case during the high-risk exposure period.
5. We will make COVID-19 testing available to our employees who had close contact with the COVID-19 case at no cost during working hours and provide information on COVID-19 related benefits, with the following exception:
 - COVID-19 cases who have met the return to work criteria and remain symptom free for 90 days after the initial onset of symptoms or the first positive test for asymptomatic cases.

NOTE – Recovered COVID-19 cases listed above will have testing made available to them if they develop symptoms following close contact in the workplace.
6. Investigate whether any workplace factors contributed to the infection and how to further reduce that potential exposure.

We will provide information about COVID-19 related benefits at the time of excluding an employee from the workplace due to becoming a COVID-19 case. **Confidentiality will be maintained at all times.**

We keep a record of and track all COVID-19 cases to include: employee's name, contact information, occupation, location where the employee worked, the date of the last day at the workplace, and the date of a positive COVID-19 test. This information is kept confidential.

Exclusion from the Workplace

The following employees will be excluded from the workplace:

- Employees with a positive test or diagnosis for COVID-19 until the Return to Work criteria in the next section are met.
- Employees that have had close contact with the COVID-19 case until the Return to Work criteria in the next section are met. This will not apply to the following:
 - Employees who were fully vaccinated prior to close contact and do not develop COVID-19 symptoms if they wear a face covering and maintain six feet of distance from others at the workplace for 10 days following the last date of close contact.
 - Employees with a prior COVID-19 diagnosis who then met the return to work criteria and have remained symptom-free for 90 days following either 1) the initial onset of their past COVID case

symptoms, or 2) the first positive test for asymptomatic past COVID-19 cases. These employees must wear a face covering and maintain six feet of distance from others at the workplace for 10 days following the last date of close contact.

Employees not excluded according to above will be provided information about any applicable precautions recommended by CDPH for persons with close contact.

Employees excluded from work due to a positive test/diagnosis from a workplace close contact, or identified as having close contact in the workplace, will have their earnings, wages, seniority, and all other rights and benefits maintained by the University. Wages during exclusion will be paid at the regular rate of pay on the regular payday for the pay period. Employees will be informed if wages will not be maintained because the employee received disability payments or was covered by workers' compensation and received temporary disability. Information on available benefits will be provided at the time of exclusion.

Return to Work

Criteria for returning to work after testing positive for COVID-19 or having close contact with a COVID-19 case are based on CDPH's current isolation and quarantine recommendation when the periods listed in Cal/OSHA's Emergency Temporary Standard are longer than those recommended by CDPH. This recommendation is subject to change, but as of January 6, 2022 are as follows:

Person Who Test Positive for COVID-19 (Isolation)	Recommended Action
<p>Everyone, regardless of vaccination status, previous infection, or lack of symptoms.</p>	<ul style="list-style-type: none"> • Stay home for at least 5 days. • Isolation can end after Day 5 if symptoms are not present or are resolving AND a diagnostic test* collected on Day 5 or later is negative. • If not tested, isolation can end after Day 10 if symptoms are not present or resolving. • Isolation should be continued if fever is present until fever resolves. • If symptoms, other than fever, are not resolving, continue to isolate until symptoms are resolving or until after day 10. • Wear a <u>well-fitting mask</u> around others for a total of 10 days. <p><i>*Antigen (rapid test/home test) test preferred.</i></p>
Persons Who are Exposed to Someone with COVID-19 (Quarantine)	Recommended Action
<ul style="list-style-type: none"> • Unvaccinated; OR • Vaccinated and <u>booster-eligible</u> but have not yet received their booster dose. <p>NOTE: Asymptomatic employees in this category are not required to stay home from work if:</p> <ul style="list-style-type: none"> • A negative diagnostic test is obtained within 3-5 days after last exposure to a case. 	<ul style="list-style-type: none"> • Stay home for at least 5 days after last contact with COVID-19 case. • Test on Day 5. • Quarantine can end after Day 5 if symptoms are not present AND a diagnostic test collected on Day 5 or later is negative. • If not tested and symptoms are not present, quarantine can end after Day 10.

<ul style="list-style-type: none"> Employee wears a well-fitting mask around others for a total of 10 days. Employee continues to have no symptoms. 	<ul style="list-style-type: none"> Wear a <u>well-fitting mask</u> around others for a total of 10 days. If test is positive, follow isolation recommendations. If symptoms develop, test and stay home.
Persons Who are Exposed to Someone with COVID-19 (No Quarantine)	Recommended Action
<ul style="list-style-type: none"> Boosted; OR Vaccinated, but not yet <u>booster-eligible</u>. 	<ul style="list-style-type: none"> Test on Day 5. Wear a well-fitting mask around others for 10 days. If test positive, follow isolation recommendations. If symptoms develop, test and stay home.

- Employees who have completed the required time to isolate, quarantine, or exclude ordered by a local or state health official can return to work. If the exclusion time period was not specified, one of the symptom-based criteria above will be used to determine when to return to work.
- Employees that have approval from Cal/OSHA on the basis that removal of the employee would create undue risk to a community’s health and safety can return to work. In these instances, effective control measures such as isolation or respiratory protection will be implemented to prevent infection of other employees at the workplace.

REPORTING, RECORDKEEPING, AND ACCESS

Reporting

Reporting to the Local Health Department (LHD) – This requirement also complies with AB 685.

Within 48-hours of knowledge, Human Resources will notify the local health department (LHD), Orange County Health Care Agency, (855)886-5400, of any workplace outbreak of COVID-19. An outbreak reportable to our LHD is defined as at least three COVID-19 cases among workers at the same worksite within a 14-day period. We will work with the LHD to carry out contact tracing and follow all LHD recommendations including temporary closure of our business if advised.

Reporting to our Claims Administrator – SB 1159 (This section applies to employers with five or more employees)

Human Resources will report to The Hartford, Denise Bascherini when an employee has tested positive for COVID-19. This report will be made within three days of knowledge of an employee’s positive test result.

CAL/OSHA Recording/Reporting - We will record on our 300 log all work-related COVID-19 cases that meet one of the following criteria: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, loss of consciousness, significant injury or illness diagnoses by a physician or other licensed health care professional.

We will report any serious COVID-19 illness that required inpatient hospitalization or resulted in death to our local Cal/OSHA office as soon as possible, but in no case more than eight hours after knowledge.

Recordkeeping

The University maintains records of the steps taken to implement this written program. These records include but are not limited to training, inspections, hazard identification, etc.

We keep a record of and track all COVID-19 cases. These records include the employee's:

- Name
- Contact information
- Occupation
- Location where the employee worked
- Date of the last day at the workplace
- Date of positive COVID-19 test

All medical information will be kept confidential. The log of COVID cases, with names and contact information removed, will be made available to employees, authorized employee representatives, or as otherwise required by law.

Access

This program will be made available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA.

COMMUNICATION SYSTEMS

We ask all employees to confidentially report, without fear of discrimination or retaliation, any symptoms, potential exposures, and possible hazards relating to COVID-19 at the workplace. Employees should make these reports to Human Resources.

We explain to all employees how we accommodate employees at higher risk of severe COVID-19 illness. They can make a confidential report of their own high risk condition to Human Resources.

If an employee is potentially exposed to COVID-19, or is experiencing symptoms of COVID-19 and is not fully vaccinated, we will provide information about access to COVID-19 testing at no cost and during paid work hours. We will also provide information about testing to vaccinated employees who develop COVID-19 symptoms after a close contact. Local COVID-19 testing is available in our area through the following:

- Ketchum Health Clinic, 5460 E. La Palma Ave. Anaheim
- COVID Clinic, 200 S. State College Blvd., Fullerton (877)219-8378

Note: Additional communication requirements may apply depending upon severity of outbreak. See Appendix A for multiple COVID-19 infections and outbreak procedures. See Appendix B for major outbreak procedures.

We communicate information about COVID-19 hazards and our COVID-19 policies and procedures to employees and other employers, persons, and entities that come in contact with our workplace. Other employers must ensure their employees follow our plan or equivalent to ensure protection of both their and our employees. When our employees are at another worksite, we will verify that procedures at the other worksite are protective of our employees, such as mask wearing and symptom screening.

EMPLOYEE TRAINING AND INSTRUCTION

We provide all employees training and instruction on the symptoms of COVID-19 illness and exposure control methods in place at the University including:

- Information on how COVID-19 spreads, including airborne and asymptomatic transmission.
- The fact that viral particles can travel more than 6', especially indoors, so physical distancing, face coverings, increased ventilation, and respiratory protection can decrease the spread of COVID-19, but are most effective when used in combination.
- Symptoms of COVID-19.
- The importance of getting a COVID-19 test and staying out of the workplace if you have symptoms.

- The importance of vaccination against COVID-19.
- Information on our COVID-19 policies, how to access COVID-19 testing and vaccination, and the fact that vaccination is effective at preventing COVID-19 – protecting against both transmission and serious illness or death.
- Our symptom screening procedures for employees and all other visitors to the workplace.
- Risk of exposure to COVID-19 on the job.
- Cleaning and disinfection schedules and procedures for our workplace.
- Control measures to protect employees from exposure and infection:
 - Requiring employees to stay home when sick.
 - Frequent handwashing with soap and water for at least 20 seconds, or using hand sanitizer when handwashing sinks are not readily accessible.
 - Conditions that require the use of face coverings at the workplace, the recommendation for people who are not fully vaccinated to wear a face covering if outdoors if 6' of distance between people can't be maintained, and how to request face coverings at the workplace.
 - Proper use of a face coverings when required and the fact that a face covering is NOT respiratory protection. Face coverings are source control used to contain infectious particles and protect others; respirators protect the wearer from infectious airborne particles.
 - Covering coughs and sneezes.
- Acceptable PPE and proper use.
- Policies for providing respirators and the right of employees who are not fully vaccinated to request a respirator for voluntary use. When respirators are provided for voluntary use:
 - How to properly wear the respirator provided, and
 - How to perform a user seal check each time the respirator is donned, and
 - Facial hair can interfere with the seal of the respirator and reduce the amount of protection provided.
- What to do if they are sick and how to obtain a COVID-19 test.
- Information on COVID-19-related leave benefits available under legally mandated sick and vaccination leave, if applicable, workers' compensation law, local governmental requirements, the University leave policies, leave guaranteed by contract, and section 3205.
- The contents of this plan.

APPENDIX A - MULTIPLE COVID-19 INFECTIONS AND OUTBREAKS

The following procedures will be followed in addition to our CPP whenever three or more employee COVID-19 cases within an exposed group (as defined in section 3205(b)) have visited our workplace during their high-risk exposure period within a 14-day period. These procedures can be stopped only after no new COVID-19 cases are detected in the exposed group for a 14-day period.

Testing

The University will make testing available to employees within the exposed work group at no cost during working hours except for:

- Employees not present during the outbreak period defined above.
- COVID-19 cases who have returned to work after meeting the Return to Work criteria and do not develop symptoms for 90 days since their initial symptom onset or first positive test.

This testing will be made available immediately after determination of an outbreak, and then again one week later; negative test results will not change the quarantine, exclusion, or health order status of any individual. Following these two tests, we will make testing available to employees in the exposed group during the defined outbreak period at least once a week, or more frequently if recommended by the LHD. We will provide additional testing as required by the Division in accordance with any special order from Cal/OSHA.

Additional Controls to Correct COVID-19 Hazards

In addition to the controls listed in our CPP, we will do the following:

- Require employees in the exposed group to wear face coverings when indoors or when outdoors and less than 6' from another person unless one of the exceptions to face coverings listed in our CPP applies.
- Notify employees in the exposed group that they can request a respirator for voluntary use if they are not fully vaccinated.
- Evaluate whether to implement physical distancing of at least 6' between people, and where 6' of distance is not feasible whether to use cleanable solid partitions of sufficient size to reduce COVID-19 transmission.
- In buildings or structures with mechanical ventilation, we will maximize the outdoor air supply, and filter recirculated air with MERV 13 or higher efficiency filters if compatible with the ventilation system. If MERV 13 or higher filters are not compatible we will use filters with the highest rating that are compatible. We will further evaluate whether portable or mounted HEPA filtration units or other air cleaning systems would reduce the risk of transmission and if so implement their use where feasible.

Workplace Investigation, Review, and Hazard Correction

We will investigate all workplace illness to determine potential factors in the workplace that could have contributed to the COVID-19 outbreak. Additionally, we will review our relevant COVID-19 policies, procedures, and controls and we will implement changes needed to prevent further virus spread.

All investigations and reviews will be documented to include:

- Investigation of new or continuing COVID-19 hazards.
- Review of our leave policies and practices, including whether employees are discouraged from staying home when sick.
- Review of our COVID-19 testing policies.
- Investigation of the sufficiency of outdoor air.
- Investigation of the sufficiency of air filtration.

- Investigation into feasibility of physical distancing.

These reviews will be updated every 30 days that this appendix is in effect with new information, new or previously unrecognized COVID-19 hazards, or as necessary. We will make changes based on investigations and reviews to reduce the spread of COVID-19 and consider such actions as moving work tasks outdoors, allowing employees to work remotely, increasing outdoor air supply to our indoor workplaces, improving air filtration to the highest MERV rating compatible with our air handling system, increasing physical distancing as much as feasible, requiring respiratory protection in compliance with section 5144, or other applicable control measures.

APPENDIX B – MAJOR COVID-19 OUTBREAKS

The following procedures will be followed in addition to our CPP and Appendix A – Multiple COVID-19 Infections and Outbreaks, whenever 20 or more employee COVID-19 cases within an exposed group (as defined in section 3205(b)) have visited our workplace during their high-risk exposure period within a 30-day period. These procedures will apply until there are fewer than three COVID-19 cases detected in the exposed group for a 14-day period.

Testing

The University will continue to provide testing as described in Appendix A of our CPP except that testing will be made available to all employees in the exposed group, regardless of vaccination status, twice a week or more frequently if recommended by the Local Health Department (LHD).

Additional Controls to Correct COVID-19 Hazards

In addition to the controls listed in our CPP and Appendix A, we will do the following:

- Provide respirators for voluntary use to employees in the exposed group and determine the need for a respiratory protection program or changes to our existing program to address COVID-19 hazards and be in compliance with section 5144.
- Any employee in the exposed work group not wearing a respirator required by the University in compliance with section 5144 will be separated from other people by 6' except when demonstrated to not be feasible or when they are momentarily closer than 6' during movement. When it is not feasible to maintain 6' of distance, individuals will be as far apart as feasible. Methods for physical distancing include:
 - Reducing the number of persons in an area at one time (including visitors)
 - Visual cues such as signs and floor markings to show employee locations and paths of travel
 - Staggered arrival, departure, work, and break times
 - Adjusted work processes (such as reducing production speed) to allow greater distance between employees
 - Telework or other remote work arrangement
- At workstations such as cash registers, desks, and production lines, where an employee is assigned to work for an extended period of time and physical distancing is not maintained at all times, we will install cleanable solid partitions that will effectively reduce transmission.
- Evaluate whether to halt some or all operations at the workplace until COVID-19 hazards have been corrected.
- Take other control measures deemed necessary by the Division through the Issuance of Order to Take Special Action, in accordance with Title 8 Section 332.3.