



COVID-19 Prevention Program (CPP) for Design Tech High School, Redwood City, CA

DATE: January 29, 2021

PURPOSE

The purpose of the School's COVID-19 Prevention Program ("CPP") is to provide a healthy and safe workplace as required under the California Occupational Safety and Health Act (Labor Code §§ 6300, *et seq.*) and associated regulations (8 C.C.R. § 3205).

Nothing in this CPP precludes the School from complying with federal, state, or local laws or guidance that recommends or requires measures that are more prescriptive and/or restrictive than are provided herein.

SCOPE

This CPP applies to all School's employees except for those employees who are exclusively teleworking or subject to the Aerosol Transmissible Diseases ("ATD") program.

DEFINITIONS

For the purposes of the CPP, the following definitions shall apply:

"COVID-19" means coronavirus disease, an infectious disease caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).

"COVID-19 case" means a person who either: (1) Has a positive "COVID-19 test" as defined in this section; (2) Is subject to COVID-19-related order to isolate issued by a local or state health official; or (3) Has died due to COVID-19, in the determination of a local health department or per inclusion in the COVID-19 statistics of a county. A person is no longer a "COVID-19 case" when a licensed health care professional determines that the person does not have COVID-19, in accordance with

recommendations made by the California Department of Public Health (CDPH) or the local health department pursuant to authority granted under the Health and Safety Code or title 17, California Code of Regulations to CDPH or the local health department.

“Close contact COVID-19 exposure” means being within six (6) feet of a COVID-19 case for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the “high-risk exposure period” as defined here. This definition applies regardless of the use of face coverings.

“COVID-19 hazard” means exposure to potentially infectious material that may contain SARS-CoV-2, the virus that causes COVID-19. Potentially infectious materials include airborne droplets, small particle aerosols, and airborne droplet nuclei, which most commonly result from a person or persons exhaling, talking or vocalizing, coughing, sneezing, or procedures performed on persons which may aerosolize saliva or respiratory tract fluids, among other things. This also includes objects or surfaces that may be contaminated with SARS-CoV-2.

“COVID-19 symptoms” means one of the following: (1) fever of 100.4 degrees Fahrenheit or higher or chills; (2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches; (6) headache; (7) new loss of taste or smell; (8) sore throat; (9) congestion or runny nose; (10) nausea or vomiting; or (11) diarrhea, unless a licensed health care professional determines the person’s symptoms were caused by a known condition other than COVID-19.

“COVID-19 test” means a viral test for SARS-CoV-2 that is both: (1) Approved by the United States Food and Drug Administration (FDA) or has an Emergency Use Authorization from the FDA to diagnose current infection with the SARS-CoV-2 virus; and
(2) Administered in accordance with the FDA approval or the FDA Emergency Use Authorization as applicable.

“Exposed workplace” means any work location, working area, or common area at work used or accessed by a COVID-19 case during the high-risk period, including bathrooms, walkways, hallways, aisles, break or eating areas, and waiting areas. This can also include an offsite field location.

The exposed workplace does not include buildings or facilities not entered by a COVID-19 case. Effective January 1, 2021, the “exposed workplace” also includes but is not limited to the “worksite” of the COVID-19 case as defined by Labor Code section 6409.6(d)(5).

“Face covering” means a tightly woven fabric or non-woven material with no visible holes or openings, which covers the nose and mouth.

“High-risk exposure period” means the following time period: (1) For persons who develop COVID-19 symptoms: from two (2) days before they first develop symptoms until ten (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; or (2) For persons who

test positive who never develop COVID-19 symptoms: from two (2) days before until ten

- days after the specimen for their first positive test for COVID-19 was collected.

Authority and Responsibility

Ken Montgomery, Executive Director along with Hanan Holloway, Director of Business Operations and Facilities have overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all directors 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 have implemented the following in our workplace:

- Workplace-specific evaluations Appendix A: Identification of COVID-19 Hazards form
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace as they occur.
- Review of applicable orders, general and industry-specific guidance from the Centers for Disease Control, State of California, Cal/OSHA, the San Mateo County Office of Education and the County of San Mateo Public Health related to COVID-19 hazards and prevention.
- Existing COVID-19 prevention controls in our workplace and we will evaluate the need for different or additional controls, as the need arises.
- Periodic inspections 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. Appendix B: Covid 19 Inspections.

Employee participation

Employees and their authorized employee representatives are encouraged to continue to participate in the identification and evaluation of COVID-19 hazards. Employees can contact Hanan Holloway for COVID-19 compliance complaints.

Employee screening

Employees will self-screen for COVID-19 symptoms when reporting to our facility. They will answer screening questions and take temperature. Employees will sanitize or wash hands before entry to the building. All necessary items are provided at the entry of School.

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented and corrected in a timely manner based on the severity of the hazards.

Control of COVID-19 Hazards

Physical Distancing

- We ensure at least six feet of physical distancing at all times in our workplace.
- In the classroom, teacher areas are at least 6 feet away from any student table.
- The staff lounge is only open for copying papers, retrieval of items. No work or socializing can be done in the staff lounge.
- Eliminating the need for workers to be in the workplace – e.g., telework or other remote work arrangements.
- Teach remotely when possible.
- Reducing the number of persons in an area at one time.
- No visitors on campus while staff is on campus. Maintenance and Oracle Engineers will be on campus after school hours.
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Moved and removed furniture (desks/tables/chairs) to ensure 6 feet apart.

Face Coverings

We provide face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, 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 San Mateo County Health.

Employees are encouraged to contact their supervisor if they need additional face coverings or have any other concerns.

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

Staff/Students are ENCOURAGED to eat outside. If weather does not permit, staff/students must be at least 6 feet apart and only take the mask off to eat. Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any approved 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. Testing cannot be used in place of a face covering requirement for a non-approved reason. The twice weekly testing mentioned in this section is not on School time or reimbursable by the School.

Design Tech High School's Notice on Masks:

A mask/face covering is defined by The San Mateo County Health Officer as follows: A covering made of cloth, fabric, or other soft or permeable material, without holes, that covers only the nose and mouth and surrounding areas of the lower face. A face covering should not be medical grade or use a valve device. A "Face Covering" is deemed an essential clothing item that is laundered at home by hand or machine

Engineering controls

We continue to implement the following measures for situations where we cannot maintain at least six feet between individuals: Develop cohort shifts to maintain office social distancing protocols, encourage teleworking where possible or reconfigure space if necessary.

We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems. The School/Oracle (owners of the building) take all reasonable precautions to prevent the distribution of unhealthy air circulating through School facility air distribution systems. These precautions include performing regular preventive maintenance and filter changes, exclusive use of high efficiency air filters, and maximizing outside fresh air intake in the operation of our buildings' air distribution systems wherever possible (weather permitting).

Cleaning and disinfecting

We continue to implement the CDPH and San Mateo County Pandemic Recovery Framework cleaning and disinfection measures for frequently touched surfaces as outlined in our School Reopening Plan including:

- Place hand sanitizer dispensers in lobbies/common areas.
- Prop doors open to reduce touching of handles as appropriate.
- Provide disinfectant wipes in appropriate locations; post signage advising occupants to sanitize touch surfaces before and after each use.
- Informing the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection.
- Ensuring adequate supplies and adequate time for the cleaning to be done properly.
- Sink, paper towels and soap dispensers in every classroom.
- Tables/chairs and work areas will be sanitized at the end of each use.
- Students will be asked to help wipe down the desk or equipment which was used with a cleaning wipe. Teachers will supervise the use of any cleaning materials. Purell disinfectant will be used and wipes purchased by the SMCOE will be used.
- Service by Medallion custodians will be on campus during the school day to assist in cleaning in the classrooms, offices, restrooms, and common areas. Service by Medallion crews will do a thorough cleaning in between morning and afternoon sessions. Service by Medallion will ensure that classroom doors are open to allow for proper ventilation. (When school is on campus)
- Staff and custodians will also clean/disinfect high-touch areas at least twice during the day. (When school is in session on campus)
- The custodians will do a thorough cleaning every evening.
- All cleaning supplies will be stored in locked janitorial closets.

Should we have a COVID-19 case in our workplace, it is a priority that School facilities, and the workplace, are maintained at the highest standard of cleanliness. The School has directed the janitorial service providers using contract amendments to 1) conduct more frequent cleanings throughout the day in public spaces and common areas, as well as 2) use EPA-approved germicide/disinfectant



products to ensure all surfaces and touchpoints in public areas and within the workplace are properly sanitized. A more detailed cleaning protocol is available from the School upon request.

Shared tools, equipment and personal protective equipment (PPE)

- PPE must not be shared, ie) gloves, goggles and face shields.
- Each teacher has their own classroom; the phones in those classrooms will not be used by more than 1 person.
- There are no offices shared by the majority of staff. If an office is shared they will provide specific separation from the other individual in the room by a wall/window or the offices will not be shared at the same time with another individual.
- Each individual will have their own workspace in shared offices.
- Each employee has their own computer; no computers will be shared
- The copy room will only have one staff member at a time.
- No school supplies will be shared between students unless a strict disinfecting protocol is put in place between each student.

Hand sanitizing

We have implemented effective hand sanitizing procedures by:

- Evaluating hand washing facilities.
- Sink, soap, paper towels in every classroom.
- Encouraging and allowing time for employee handwashing.
- Providing employees with an effective hand sanitizer.
- Encouraging employees to wash their hands for at least 20 seconds each time.
- Employees using soap and water must follow CDC guidance on proper handwashing techniques, including washing their hands for at least 20 seconds with soap, rubbing thoroughly after application, and using paper towels to dry hands thoroughly (available at <https://www.cdc.gov/handwashing/index.html>).
- Employees will also be reminded not to touch their faces, and to use a tissue to wipe their nose and to cough and sneeze inside the tissue. The School encourages parents to also remind students to follow these practices.

Personal protective equipment (PPE) used to control employees' exposure to COVID-19



We evaluate the need for PPE (such as masks, gloves, and face shields) as required by CCR Title 8, section 3380, and provide such PPE as needed. Employees can request additional PPE if they need it through the Director of Business Operations. 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.

Investigating and Responding to COVID-19 Cases

This will be accomplished by using Appendix C: Investigating COVID 19 Cases.

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

- Will receive an email communication within 24 hours if they are a close contact or indirect contact to a COVID-19 positive case (employee or student).
- Quarantine for 14 days, and have the opportunity to work/teach from home.
- All employees are required to take a COVID test twice per month, during school hours, at no cost to the employee.
- Will be provided with information on benefits continuation.

System for Communicating

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

- Employees should report COVID-19 symptoms and possible hazards to their supervisor or Director of Business if they have any concerns. Employees can report symptoms and hazards without fear of retaliation or reprisal.
- Employee representatives should contact Director of Business to identify any hazards or concerns.
- Employees with medical or other conditions that put them at increased risk of severe COVID-19 illness are encouraged to discuss options with their supervisor or Director of Business..
- Where testing is not School provided or paid, employees can access COVID-19 testing through their primary healthcare provider or <https://www.smcgov.org/testing>.
- In the event the School is 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.
- 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 will be documented and provided.

Training and Instruction

We continue to 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.

Exclusion of COVID-19 Cases

- Exclusion of COVID-19 Cases from Facilities

The School will ensure that COVID-19 cases are excluded from the workplace until the individual satisfies the minimum return to work criteria. Telework may be available during this time.

- Exclusion of Employees with Close Contact COVID-19 Exposures from School Worksites and Facilities



The School will exclude employees with close contact COVID-19 exposure from the workplace for 14 days after the last known close contact COVID-19 exposure. The School and employee will review options such as telework during this time, as appropriate.

- Provision of Benefits to Employees Excluded from Work as a Result of a Positive COVID-19 Test or Diagnosis or a Close Contact COVID-19 Exposure

Employees Who Are Able to Telework During Isolation or Quarantine Period

The School will allow employees who are able to telework, and are able and available to work, to telework during the isolation or quarantine period. The School will provide these employees their normal compensation for the work that they perform for the School during the isolation or quarantine period.

- Employees Who Are Unable to Telework During Isolation or Quarantine Period

The provision of benefits described below does not apply to either: (1) School employees who the School can demonstrate that the close contact was not work related (2) School employees who are unable to work for reasons other than protecting employees and non-employees at School worksites and facilities from possible COVID-19 transmission.

For other employees, the School will require that employees who are unable to telework, but are otherwise able and available to work, to use paid sick leave in order to receive compensation during the isolation or quarantine period. School employees retain their entitlement to elect not to use other earned or accrued paid leave during this time. The School may provide such employees who are unable to telework, but who do not have any paid sick leave available, other paid leave in order to receive compensation during the isolation or quarantine period.

For all employees who are subject to an isolation or quarantine because of a COVID-19 case or a close contact COVID-19 exposure, the School will maintain the employees' seniority and all other employee rights and benefits, including the employees' right to their former job status, during the isolation or quarantine period.

The School will consider benefit payments from public sources, including under the FFCRA and Labor Code section 248.1 (until December 31, 2020 or longer if FFCRA leave and/or Labor Code section 248.1 leave is extended), in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers' compensation. Employee should contact Director of Business.



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 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.
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Keep a record of and track all COVID-19 cases. The information is made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

Return-to-Work Criteria

Minimum Criteria to Return to Work for Symptomatic COVID-19 Cases

The School requires that COVID-19 cases with COVID-19 symptoms remain at their home or place of residence and not report to any School worksite or facility until they satisfy each of the following conditions:

At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications; and

COVID-19 symptoms have improved; and

At least 10 days have passed since COVID-19 symptoms first appeared.

Minimum Criteria to Return to Work for Asymptomatic COVID-19 Cases

The School requires that COVID-19 cases who tested positive but never developed COVID-19 symptoms not report to any School worksite or facility until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test; OR

If a licensed health care professional determines the person is not/is no longer a COVID-19 case, in accordance with California Department of Public Health (CDPH) or local health department recommendations.



COVID-19 Testing Not Required in Order to Return to Work

In accordance with CDPH guidance concerning symptom-based strategies for the discontinuation of isolation, the School does not require employees submit to a COVID-19 test, or produce a negative COVID-19 test result, in order to return to work.

Minimum Criteria to Return to Work for Employees Directed to Self-Quarantine or Isolate by a State or Local Health Official

If employees are subject to an isolation or quarantine order issued by a state or local health official, the School requires that the employees not report to any School worksite or facility until the period of isolation or quarantine is completed or the order is lifted.

If the order did not specify a definite isolation or quarantine period, then the period shall be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.

Allowance by Cal/OSHA for an Employee to Return to Work

If there are no violations of state or local health officer orders for isolation or quarantine, Cal/OSHA may, upon request, allow employees to return to work on the basis that the removal of employees would create undue risk to a community's health and safety.

In such cases, the School will develop, implement, and maintain effective control measures to prevent transmission in the workplace including providing isolation for the employees at the School worksite or facility and, if isolation is not possible, the use of respiratory protection in the workplace.



Appendix A: Identification of COVID-19 Hazards

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

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

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

Date: [enter date]

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

Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards	Places and times	Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers	Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation



Appendix B: COVID-19 Inspections

Date: [enter date]

Name of person conducting the inspection: [enter names]

Work location evaluated: [enter information]

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Ventilation (amount filtration maximized)			
Administrative			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			



Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 testing or related medical services provided by us will be provided in a manner that ensures the confidentiality of employees, with the exception of unredacted information on COVID-19 cases that will be provided 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		Information received	



one or more COVID-19 symptoms:		regarding COVID-19 test results and onset of symptoms (attach documentation):	
Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):			



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:

<p>All employees who may have had COVID-19 exposure and their authorized representatives.</p>	<p>Date:</p>	
	<p>Names of employees that were notified:</p>	
<p>Independent contractors and other employers present at the workplace during the high-risk exposure period.</p>	<p>Date:</p>	
	<p>Names of individuals that were notified:</p>	

<p>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</p>		<p>What could be done to reduce exposure to COVID-19?</p>	
<p>Was the local health department notified?</p>		<p>Date:</p>	

Appendix D: COVID-19 Training Roster

Date: [enter date]

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

Employee Name	Signature

Additional Considerations

Design Tech High School will follow the guidance from the San Mateo County pandemic recovery framework

<https://www.smcoe.org/other/for-administrators/school-recovery-planning.html>

Multiple COVID-19 Infections and COVID-19 Outbreaks

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period

COVID-19 testing

- We will provide COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period. COVID-19 testing will be provided at no cost to employees during employees' working hours.
- COVID-19 testing consists of the following:
 - All employees in our exposed workplace will be immediately tested and then tested again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by, the local health department.
 - After the first two COVID-19 tests, we will continue to provide COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
 - We will provide additional testing when deemed necessary by Cal/OSHA.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria** requirements, and local health officer orders if applicable.

Investigation of workplace COVID-19 illness

We will immediately investigate and determine possible workplace-related

factors that contributed to the COVID-19 outbreak in accordance with our **CPP Investigating and Responding to COVID-19 Cases**.

COVID-19 investigation, review and hazard correction

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

The investigation and review will be documented and include:

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

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.