



# Covid Protection Plan

July 2022

## COVID-19 Prevention Program (CPP) for Valley Waldorf City School

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

**UPDATED: August 3, 2022**

### Authority and Responsibility

**The pedagogical administrator and office administrator** have 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. Any clarifying or material questions that employees may have about the provisions in the CPP, should first be addressed to Campus Marshalls, Linda Murca and/or Sarah Northrip.

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.
- Document the vaccination status of our employees by using **Appendix E: Documentation of Employee COVID-19 Vaccination Status**, which is maintained as a confidential medical record.

**[Note: The Cal/OSHA COVID-19 Emergency Temporary Standards do not require employers to document employee vaccination status. Required protective measures in the Emergency Temporary Standards are the same regardless of the vaccination status of employees.]**

- 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.
- Face coverings/masks are mandatory on our campuses. Campuses are closed to non-essential visitors. Social distancing guidelines, mask wearing, and handwashing reminders are posted throughout campus.
- Flow of pedestrian traffic is indicated by posted signs and arrows on stairwells and concrete walkways throughout campus.
- Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by our open-door policy of reporting issues and concerns to Linda Murca and/or Sarah Northrip, our Covid Compliance Officers.
- We also have full PPE supplies and cleaning and sanitization items available to all employees, as needed.

### **Employee participation**

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by notifying the school office immediately of known exposures or cases of COVID-19 within their classes, notifying the school office immediately of suspected COVID-19 or of a student or other individual on campus who has symptoms of COVID-19.

### **Employee screening**

We screen our employees by requiring them to self-screen before leaving for work according to CDPH guidelines. Parents/guardians are required to self-screen students before leaving to bring their child to campus and to sign a certification upon dropping their child off at campus according to CDPH guidelines.

## **Correction of COVID-19 Hazards**

Unsafe or unhealthy work conditions, practices or procedures will be documented on the **Appendix B: COVID-19 Inspections** form, and corrected in a timely manner based on the severity of the hazards, as follows:

- On a day-to-day basis, teachers and staff work together to assess possible hazards.
- On a weekly basis the staff monitor the school area under their purview to identify any potential hazards or work conditions that need attention.
- Mask and social distancing protocols are followed throughout the school day.
- Each restroom includes signage and supplies for disinfecting after use. Teachers are expected to help young students clean after using the restroom. Handwashing signs are posted throughout campus.

Classrooms are cleaned by teachers and students throughout the day, and professionally cleaned and sanitized weekly.

- If a student, teacher, or staff member tests positive for COVID-19, their classroom or office is cleaned by janitorial, performs deep clean plus sanitization.
- Proper protocol is followed to report cases to DHS. In-house contact tracing is followed, and communication goes out to all pertinent parents/guardians, and employees regarding any positive COVID-19 exposure, including updates, as needed.
- A licensed medical waste disposal service will dispose of hazardous materials, as needed. The severity of the hazard will be assessed, and correction time frames assigned, accordingly. Individuals are identified as being responsible for timely correction. Follow-up measures are taken to ensure timely correction.

## Control of COVID-19 Hazards

### Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees when required by orders from the **California Department of Public Health (CDPH)**. Face coverings will be provided, worn over the nose and mouth, replaced, and cleaned, as needed. When required by CDPH face coverings will be worn over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department.

We have 3 different types of face coverings available: disposable masks (adult and children sizes), plastic face shields (adjustable/one size fits all). These items are available to all employees, students, and visitors, as needed. Masks/face coverings are currently **recommended and/or optional** for anyone on school property. Masks will be provided to employees, students, and authorized visitors as needed.

Employees required to wear face coverings in our workplace may remove them under the following conditions:

- When an employee is alone in a room or a vehicle.
- 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.
- When employees are required to wear respirators in accordance with our respirator program that meets section 5144 requirements.
- 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. Such employees will wear an effective, non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition permits it. **Employees must work with the administrative and pedagogical team on reasonable accommodations prior to entering campus or interacting with staff or students without a face covering or other PPE.** If their condition does not permit it, then the employee will be tested at least weekly for COVID19.
- Employees wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- Specific tasks that cannot feasibly be performed with a face covering. This exception is limited to the time in which such tasks are performed.
- Any employee not wearing a required face covering will be tested at least weekly for COVID-19.
- We will not prevent any employee from wearing a face covering when it is not required unless it would create a safety hazard, such as interfering with the safe operation of equipment.

- Face coverings will also be provided to any employee that requests one, regardless of their vaccination.

## **Engineering controls**

For indoor locations, using Appendix B, we identify and evaluate how to maximize, to the extent feasible ventilation with outdoor air using the highest filtration efficiency compatible with our existing ventilation system, and whether the use of portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems, would reduce the risk of transmission by:

We implement the following measures for situations where we cannot maintain at least six feet between individuals: recommend masks; keep pods of children separate, in different areas of campus, at recess; maximum occupancy is 1 person in all restrooms; allowing only one customer at a time, by appointment only, into our on-campus school store.

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

- Keeping doors and windows open whenever an indoor classroom or space is in use.
- If air quality for outdoor use on campus is untenable due to wildfire smoke or air pollution from other causes, we close the campus and hold virtual classes and staff and students stay home, instead.
- Ventilation systems are professionally cleaned and checked on a regular schedule. Filters are changed out as needed.
- We strive to increase filtration efficiency to the highest level compatible with our existing ventilation system(s) within our operational constraints.

## **Hand sanitizing**

To implement effective hand sanitizing procedures, we:

- Provide indoor and outdoor handwashing stations fully supplied with soap and paper towels.
- Posted hand washing reminder signs and proper hand washing technique signs throughout campus and in all handwashing-specific areas.
- Distributed effective and safe hand sanitizer to all offices and classrooms.
- Encourage and allow time for employee handwashing.
- Provide employees with an effective hand sanitizer and prohibit hand sanitizers that contain methanol (i.e., methyl alcohol).
- Encourage employees to wash their hands for at least 20 seconds each time.

Employees would determine the safest way to handle any immediate clean-up need, i.e., vomit on a desk or floor, etc. A request to the professional custodial service for a deep clean and sanitizing service (hospital grade) would be placed immediately.

## **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 and respiratory protection when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

**We provide plastic, adjustable face shields to employees, and disposable, fluid resistant hospital gowns to employees who may need to care for sick students that need to isolate at school until a parent or guardian can get them.**

## Testing of employees

We make COVID-19 testing available at no cost, during paid time, to all employees:

- Who had close contact in the workplace; or
- Who have COVID-19 symptoms, and
- During outbreaks and major outbreaks (see below for further details)

## Investigating and Responding to COVID-19 Cases

We have developed effective procedures to investigate COVID-19 cases that include seeking information from our employees regarding COVID-19 cases, close contacts, test results, and onset of symptoms. This is accomplished by using the **Appendix C: Investigating COVID-19 Cases** form.

We also ensure the following is implemented:

- Employees that had a close contact are offered COVID-19 testing at no cost during their working hours, except for returned cases as defined in 3205(b)(11).
- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to these employees.
- Written notice within one business day of our knowledge of a COVID-19 case that people at the worksite may have been exposed to COVID-19. This notice will be provided to all employees (and their authorized representative), independent contractors and other employers on the premises at the same worksite as the COVID-19 case during the infectious period. These notifications will meet the requirements of T8CCR section 3205(c)(3)(B) and Labor Code section 6409.6(a)(4); (a)(2); and (c).
- We consider a “close contact” that meets the definition in section 3205(b)(1), unless it is otherwise defined by CDPH; “infectious period” meets the definition in 3205(b)(9), unless it is otherwise defined by CDPH; and “worksite” meets the section 3205(b)(12) definition.

## 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:

- Employees should report COVID-19 symptoms and possible hazards to their immediate supervisor and Covid-Compliance Officer either by direct conversation, phone call or email, and how Employees can report symptoms and hazards without fear of reprisal.
- Accommodating employees with medical or other conditions that put them at increased risk of severe
- COVID-19 illness is accomplished through direct interview and agreement with either the Pedagogical or Office Administrators (depending on the area in which the employee works).
- Where testing is not required, employees can access COVID-19 testing through their health insurance provider or at free testing sites within LA County. All employees have been provided links with information about testing and those resources are updated as needed.
- Asymptomatic testing is strongly recommended to all on-campus employees at a rhythm of once every week until recommendations change based on reduced community transmission levels. Bi-weekly testing is offered on-campus through a licensed vendor in the interim through the end of the school year for staff and enrolled families.
- Resources for testing at free sites in the county are routinely shared with employees via faculty meeting notes, group texts and email updates.
- 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. Information on how employees can access rapid testing is given where necessary.

- COVID-19 hazards via other employers and individuals in contact with our workplace are being minimized by limiting the number of visitors contractors and vendors who have access to our campus and work areas and by performing health screening including temperature checks on all visitors to the school site. Contact information is gathered for all campus visitors in case we need to include them in any contact tracing or case investigations.

## 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, and how to participate in the identification and evaluation of COVID-19 hazards.
- Information regarding COVID-19-related benefits (including mandated sick and vaccination leave) 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.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing, face coverings, increased ventilation indoors, and respiratory protection decrease the **spread** of COVID-19 are most effective when used in combination.
- The right of employees to request a respirator for voluntary use, as required by section 3205, without the fear of retaliation, and our policies for providing the respirators. Employees voluntarily using respirators will be provided with effective training and instruction according to section 5144(c)(2) requirements, including:
  - How to properly wear them; and
  - How to perform a seal check according to the manufacturer's instructions each time a respirator is worn, and the fact that facial hair can interfere with a seal.
- 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, airborne disease, while face coverings are primarily protect around the user.
- The condition where face coverings and can wear them at work regardless of vaccination status and without fear of retaliation.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- Information on our COVID-19 policies and 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.

**Appendix D: COVID-19 Training Roster** will be used to document this training.

## Exclusion of COVID-19 Cases and Employees who had a Close Contact

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 the return-to-work requirements in section 3205(c)(10) are met.
- Reviewing current CDPH guidance for persons who had close contacts, including any guidance regarding quarantine or other measures to reduce transmission.
- Developing, implementing, and maintaining effective policies to prevent transmission of COVID-19 by persons who had close contacts.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we have demonstrated that the COVID-19 exposure is work related. This will be accomplished by following the practices set forth in our employee handbook and COVID-19 handbook addendum.
- Providing employees at the time of exclusion, or when otherwise requested, 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.
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*Approved and formalized for use by The City School DBA Valley Waldorf City School by Linda Murca,  
Office Administrator on August 3, 2022.*





## Appendix B: COVID-19 Inspections

Date:

Name of person conducting the inspection: Work location evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
<b>[add any additional controls your workplace is using]</b>			
<b>[add any additional controls your workplace is using]</b>			
<b>Administrative</b>			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
<b>[add any additional controls your workplace is using]</b>			
<b>[add any additional controls your workplace is using]</b>			
<b>PPE ( not shared, available and being worn)</b>			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			

**[add any additional controls  
your workplace is using]**

## 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:**

**Name of person conducting the investigation:**

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

**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><b>All employees who may have had COVID-19 exposure and their authorized representatives.</b></p>	<p><b>Date:</b></p>		
	<p><b>Names of employees that were notified:</b></p>		
<p><b>Independent contractors and other employers present at the workplace during the high-risk exposure period.</b></p>	<p><b>Date:</b></p>		
	<p><b>Names of individuals that were notified:</b></p>		
<p><b>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</b></p>		<p><b>What could be done to reduce exposure to COVID-19?</b></p>	
<p><b>Was local health department notified?</b></p>		<p><b>Date:</b></p>	

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

## Appendix D: COVID- 19 Training Roster

Date:

Person that conducted the training:

Employee Name	Signature

## Additional Consideration #1

### 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.
- [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**

### **Major 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 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**

### **COVID-19 Prevention in Employer-Provided Housing**

#### **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 Linda Murca and/or Sarah Northrip.

#### **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

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

#### 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.