

# Model COVID-19 Prevention Program (CPP)

With some exceptions, all employers and places of employment are required to establish and implement an effective written COVID-19 Prevention Program (CPP) pursuant to an Emergency Temporary Standard in place for COVID-19 (California Code of Regulations (CCR), Title 8, section [3205\(c\)](#)). Cal/OSHA has developed this model program to assist employers with creating their own unique CPP tailored to their workplace.

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

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

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



November 2020

# COVID-19 Prevention Program (CPP) for Aurora School

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

**Date: January 25, 2021**

## Authority and Responsibility

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

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

## Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Prioritize the health and safety of our community, including faculty/staff, children, and families.
- Prioritize on-campus learning as health and safety conditions allow while offering remote learning to families as necessary.
- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the **Appendix B: COVID-19 Inspections form** as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.

## Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by bringing any concerns to the Head of School, [Abbie Koss](#), or the COVID liaison [Katheryn Negrosa](#). All Aurora faculty and staff are encouraged to help educate and remind students about proper mask wearing, hand washing, and social distancing.

## Employee screening

We screen our employees by: We screen our employees with daily COVID symptom checks that are completed by employees before arriving at school. The online questionnaire records an employee's temperature, common COVID symptoms, recent travel, and recent COVID diagnoses and exposures. The symptom check also asks if any fever reducing medication has been given in the last 24 hours. Employees with a fever or answering yes to any of the questions are asked to stay home.

We screen our students by daily COVID symptom checks that are completed by parents before students arrive at school. The online questionnaire records a student's temperature, common COVID symptoms, recent travel, and recent COVID diagnoses and exposures. The symptom check also asks if any fever reducing medication has been given in the last 24 hours. Students with a fever or answering yes to any of the questions are asked to stay home.

## 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:

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

### Physical Distancing

We ensure at least six feet of physical distancing at all times in our workplace by:

- Another key component of preventing the spread of infection will be to keep students and staff in stable group structures. Children and staff will be separated into stable groups of up to 16 individuals. Each classroom will be a stable group.
- Students will be set up in classrooms to be physically spaced 6 feet. All groups will be stable, meaning that the same children and staff will be grouped together throughout the school year. Children shall not move between stable groups. Stable groups shall not mix with each other, even during outdoor play and meals.
- Lead Teachers and Teaching Assistants will remain with their dedicated stable group for the entire year.
- All staff/faculty meetings will be held remotely. Lead Teacher and Teaching Assistant team meetings (along with administrative meetings) *must* be held remotely, unless meetings are held outdoors, six feet apart with face coverings on.
- All Student Study Team meetings with and without parents will be held remotely with the Learning Resource Department.
- Students will have their own materials to use and work at their own spaces, 6 feet apart from each other and teachers, as practicable.
- Specialist classes will be taught outside, remotely, or the specialist teacher will maintain a 12-foot distance from students and Teaching Assistants.
- Teachers will not congregate for their prep periods or lunch breaks.
- The Learning Specialist will be available for remote learning only (for both on-campus and home learners).
- No parents or other non-staff/non-students will be allowed on campus (including as volunteers).
- Carpooling is not recommended.
- When indoors, each stable group will remain inside their assigned classroom. No children will be permitted in the library, art or music rooms. Time in hallways will be strictly limited to travel to the bathroom, to the auditorium, or outdoors.
- Each class will have multiple designated times in the yard, the Garden Forest, and the Green Space throughout the day. Both recess and lunch will take place outdoors, weather permitting. Students will eat six feet apart.
- Students should bring a filled water bottle to school to avoid use of the school's drinking fountain.
- The play structure and sandbox will be used by one stable group at a time. With appropriate hand hygiene, cleaning of outdoor structures is not required between groups
- To avoid congestion, there will be a staggered schedule for drop-off and pick-up.
- Adults should remain in their cars when dropping off their child at school in the drop-off line.

- Students must wear face coverings over their mouths and noses during the entire drop-off procedure.
- Once cleared, students will sanitize their hands, enter the building, and go straight to their classrooms.
- Students will stay 6 feet apart from others during drop-off.

## **Face Coverings**

Teachers, staff, and students will wear face coverings and/or clear face shields indoors and outside. Families should provide reusable face coverings daily for their child(ren), which should be taken home to be washed every day.

Face coverings are to be properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department.

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

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19.

## **Engineering controls**

We implement the following measures for situations where we cannot maintain at least six feet between individuals

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

- To promote good airflow, windows will remain open in classrooms and HEPA filters and fans will be running.
- If air quality is deemed hazardous due to wildfires, students will be sent home for remote learning. Cleaning and disinfecting

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

- Custodial staff are trained for specific COVID disinfection. They will clean the bathrooms and classrooms on a daily basis.
- Cleaning products will be chosen from the [EPA-approved list "N."](#)
- Frequently touched surfaces in the classrooms (i.e. desks, tables, doorknobs, light switches, chairs) will be wiped with a disinfectant wipe at minimum at the beginning and end of each school day.

Should we have a COVID-19 case in our workplace, we will implement the following procedures: We employ a janitorial service that is COVID-19 trained and will do an immediate COVID-19 disinfection of all areas in conjunction with our daily protocol. Employees have access to disinfectant supplies and all required PPE as well and can immediately disinfect all areas of concern.

## **Shared tools, equipment and personal protective equipment (PPE)**

PPE must not be shared, e.g., gloves, goggles and face shields.

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible.

- If students occasionally share materials, teachers will wipe down these materials with disinfectant spray or wipes before another student uses them. The same goes for any shared surfaces.
- Materials left untouched for three days can be used by another person without cleaning.
- Students and staff will use hand sanitizer after use of shared equipment.

### **Hand sanitizing**

In order to implement effective hand sanitizing procedures:

- All students and staff will practice frequent and high-quality hand hygiene, either by washing hands with soap and water for 20 seconds or by using hand sanitizer.
- Hand hygiene will be required at minimum:
  - when arriving on campus
  - at the beginning and end of recess
  - before and after lunch
  - after using the bathroom
  - after use of the play structure and sandbox.

### **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. Reference section 3205(c)(E) for details on required respirator and eye protection use.

We provide and ensure use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids. [Delete if not applicable to your workplace.]

## **Investigating and Responding to COVID-19 Cases**

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

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

1. **If a student/staff member is diagnosed with COVID-19, the Head of School and Assistant to Head of School should be alerted immediately.**
2. Aurora will immediately notify the ACHD to determine next steps.
3. We will notify all individuals via email. All privacy requirements will be taken into consideration.
4. \* Close contacts should home-quarantine for 10 days from the last date of close contact—even if they initially are found to be COVID-negative. If any of them develop a fever, cough, or shortness of breath while in quarantine, they should contact their health care provider.

*\* Close contacts are currently defined as household members, intimate partners, home caregivers, and those who have spent prolonged, close face-to-face contact with the case during their infectious period.*

5. We may need to dismiss the entire school for 2-5 days (and up to 14 days if AHPD requires). We will make every effort to provide remote learning for as much time as possible during this dismissal. An initial short-term dismissal allows time for the county to help us determine appropriate next steps, including whether an extended closure is needed to stop or slow further spread of COVID-19. County recommendations for the scope and

duration of dismissals and closures will be made on a case-by-case basis using the most up-to-date information about COVID-19 and the specific cases in the community.

6. COVID testing should be obtained for all close contacts 5-7 days after last contact (or earlier if symptoms develop).
7. The Head of School may shift all learning online at her discretion. Communication regarding such emergency changes will be done via email.
8. Aurora custodial crew will implement the CDC's interim cleaning and disinfection recommendations for community facilities with suspected/confirmed cases of COVID-19.
9. Students and Staff will be tested weekly during work hours onsite at no cost to them covered by insurance or the CARES ACT. They can also receive testing outside of our normal protocol at [these locations](#).

### **Identifying and Tracing of Contacts**

The following actions will be taken if there is a confirmed case in our community:

- [Katheryn Negrosa](#), should be notified immediately
- The school will consult with the Health Department to make quarantine decisions
- Assistant to Head of School or Head of School will notify the school community
- Assistant to Head of School will share attendance and location records with the health department for contact tracing purposes.
- The Assistant to Head of School will serve as the designated contact person for the school

### **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 our COVID-19 liaison, [Katheryn Negrosa](#) and Head of School, [Abbie Koss](#) via email or by phone.
- That employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- If anyone wants/needs to get tested outside of our weekly scheduled testing, they can get tested at any of [these](#) locations. Most of these test sites are covered by Kaiser and other insurance companies.
- In the event we are required to provide testing because of a workplace exposure or outbreak, we will provide immediate COVID-19 testing onsite 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.

### **Training and Instruction**

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
  - COVID-19 is an infectious disease that can be spread through the air.
  - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
  - An infectious person may have no symptoms.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.

- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

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

## Exclusion of COVID-19 Cases

Where we have a COVID-19 case in our workplace, we will limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
- We will continue and maintain an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related.
- Providing employees at the time of exclusion with information on available benefits.

## Reporting, Recordkeeping, and Access

It is our policy to:

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

## Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
  - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
  - COVID-19 symptoms have improved.
  - At least 10 days have passed since COVID-19 symptoms first appeared.
- COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
- A negative COVID-19 test will not be required for an employee to return to work.

If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will

not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.

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Head of School

*Abigayil Koss*

1/25/2021

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## Appendix B: COVID-19 Inspections

Date: **[enter date]**

Name of person conducting the inspection: Katheryn Negrosa and Josh Johnson

Work location evaluated: **[enter information]**

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
<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			
Stable Group Structures			
<b>PPE (not shared, available and being worn)</b>			
Face coverings (cleaned sufficiently often and/or dispose of daily)			
Gloves			
Face shields/goggles			

## 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:** Katheryn Negrosa

<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):**

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

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

## Appendix D: COVID-19 Training Roster

**Date:** October 13, 2020 and a refresher on February 2, 2021

**Person that conducted the training:** Josh Johnson, Katheryn Negrosa, and Abbie Koss

Employee Name	Signature

## Additional Consideration #1

### Multiple COVID-19 Infections and COVID-19 Outbreaks

[Reference section 3205.2 for details.](#)

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

#### COVID-19 testing

- We will provide 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**

**Reference section [3205.2](#) for details.**

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

#### **COVID-19 testing**

We will provide twice a week COVID-19 testing, or more frequently if recommended by the local health department, to all employees present at our exposed workplace during the relevant 30-day period(s) and who remain at the workplace. COVID-19 testing will be provided at no cost to employees during employees' working hours.

#### **Exclusion of COVID-19 cases**

We will ensure COVID-19 cases and employees with COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria**, and any relevant local health department orders.

#### **Investigation of workplace COVID-19 illnesses**

We will comply with the requirements of our CPP **Investigating and Responding to COVID-19 Cases**.

#### **COVID-19 hazard correction**

In addition to the requirements of our CPP **Correction of COVID-19 Hazards**, we will take the following actions:

- In buildings or structures with mechanical ventilation, we will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, we will use filters with the highest compatible filtering efficiency. We will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems would reduce the risk of transmission and implement their use to the degree feasible.
- We will determine the need for a respiratory protection program or changes to an existing respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- We will evaluate whether to halt some or all operations at our workplace until COVID-19 hazards have been corrected
- Implement any other control measures deemed necessary by Cal/OSHA.

#### **Notifications to the local health department**

We will comply with the requirements of our **Multiple COVID-19 Infections** and **COVID-19 Outbreaks-Notifications to the Local Health Department**.