



Preferred  
Operator  
Group, LLC

# **Covid-19 Prevention Program**

2024 Edition

# COVID-19 Prevention Program

January 2024

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# COVID-19 Prevention Program (CPP) for

Date:

[Type Title of owner or top management representative formally approving these procedures and have them sign and date]

In an ongoing effort to prioritize employee health and safety, we have implemented the following COVID-19 Prevention Program. We ask that all employees familiarize themselves with this Program.

## Authority and Responsibility

Our dedicated team, led by \_\_\_\_\_, is responsible for implementing and maintaining the Program. Managers and supervisors are equally committed to ensuring a safe work environment in their respective areas, so employees receive answers to questions about the procedures (in a language they understand).

Every employee plays a crucial role by following safe practices, adhering to directives, and contributing to the organization's overall well-being.

## Application of the Program

COVID-19 is a recognized hazard addressed through this Program. We treat everyone in our workplace as potentially at risk (potentially infectious), irrespective of symptoms, vaccination status, or test results.

Our prevention measures include reduced indoor density (where possible), outdoor tasks with physical distancing, staggered shifts (where possible), restricted access to work areas, and other measures (if necessary) designed to protect you. (See **Appendix A: Identification of COVID-19 Hazards** and **Appendix B: COVID-19 Inspections**)

**Training and Instruction:** Training on COVID-19 prevention was provided when the Program was established and continues for new employees. It includes those with new assignments (with no prior COVID-19 training), and whenever new hazards emerge. Additionally, supervisors are to familiarize themselves with the COVID-19 hazards to which employees under their immediate direction and control may be exposed. Training is documented using **Appendix C: COVID-19 Training Roster**.

**Investigating COVID-19 Cases:** In case of COVID-19 illnesses, we conduct thorough investigations, support affected individuals, and encourage reporting of symptoms. We aim to create a supportive environment for those facing challenges and provide information on related benefits if available. Procedures to investigate COVID-19 illnesses include:

- a. Determining the day and time a COVID-19 case was last present; the date of the positive COVID-19 tests or diagnosis; and the date the COVID-19 case first had one or more COVID-19 symptoms. This is documented using: **Appendix D: Investigating COVID-19 Cases**.
- b. Effectively identify and respond to persons with COVID-19 symptoms at the workplace, incorporating the most recent guidelines by the California Department of Public Health (CDPH).
- c. Encouraging employees to report COVID-19 symptoms to their supervisor and to stay home when ill.

**Effective Procedures for Responding to COVID-19 Cases at the Workplace:** In the unfortunate event of a COVID-19 case in our workplace, we have established procedures to ensure a compassionate and supportive response:

**NOTE:** A "COVID-19 case" means a person has tested positive or been diagnosed with COVID-19 (or received a direct order from CDPH)

- a. *Immediately excluding employees from work who are considered COVID-19 cases according to the following:*
  - i. Employees who test positive but do not exhibit symptoms will not return to work during the infectious period.
  - ii. Employees who develop COVID-19 symptoms will not return to work during the shorter of either of the following:
    - a. The infectious period.
    - b. Through 10 days after the onset of symptoms and at least 24 hours have passed since a fever of 100.4 degrees Fahrenheit or higher has resolved without the use of fever-reducing medication.
  - iii. Regardless of vaccination status, previous infection, or lack of COVID-19 symptoms, a COVID-19 case must wear a face covering in the workplace until 10 days have passed since the date that COVID-19 symptoms began or, if the person did not have COVID-19 symptoms, from the date of their first positive COVID-19 test.
  - iv. Elements i. and ii. apply regardless of whether an employee has been previously excluded or other precautions were taken in response to an employee's close contact or part of an exposed group.
- b. *Review current CDPH guidance for persons with close contacts, including any guidance regarding quarantine or other measures to reduce transmission.*
- c. *The following effective policies are in place to prevent transmission of COVID-19 by persons who had close contacts.*
  - i. **Immediate Reporting:** Any employee who has had close contact with a confirmed COVID-19 case must immediately report it to their supervisor or designated point of contact.
  - ii. **Quarantine Measures:** Employees with close contacts may be required to quarantine for a specified period, following guidelines from CDPH.
  - iii. **Testing Protocols:** Employees who had close contacts will be required to undergo COVID-19 testing within a specified timeframe after the contact. The frequency of testing may be determined based on evolving health guidelines.
  - iv. **Communication and Awareness:** Clear communication will be maintained with employees about the importance of promptly reporting close contacts. This will include regular reminders of the symptoms, testing locations, and the significance of adhering to quarantine measures.
  - v. **Support Mechanisms:** Employees undergoing quarantine or isolation will receive support from the company, including regular check-ins to assess their well-being.
  - vi. **Educational Programs:** Regular training and educational programs will be conducted to ensure that employees are well-informed about the importance of reporting close contacts.

- vii. **Workspace Disinfection:** Workspaces of employees with close contacts will undergo thorough disinfection protocols to minimize the risk of transmission within the workplace.
  - viii. **Policy Review and Adjustment:** These policies will be subject to periodic reviews and adjustments based on the evolving nature of the pandemic, updates from CDPH, and employee feedback.
  - ix. **Non-Retaliation Assurance:** There will be no retaliation for reporting close contacts or taking necessary quarantine measures. Encouraging openness and transparency is crucial for effective implementation.
- d. *If an order to isolate, quarantine, or exclude* 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.
  - e. Upon excluding an employee from the workplace based on COVID-19 or close contact, we will provide information to the employee regarding COVID-19-related benefits (if available) to which they may be entitled under applicable federal, state, or local laws.

## Testing of Close Contacts

To ease concerns, we offer free COVID-19 testing during paid hours for employees who have close contacts in the workplace. We ensure that information is provided transparently and promptly, making your peace of mind a priority.

## Notification of COVID-19 Cases

In the event of COVID-19 cases, we promptly (as soon as possible) notify affected individuals and maintain transparency by posting **Appendix E Notice of Potential Exposure to COVID-19**.

We use Appendix B for documentation purposes.

## Face Coverings

Your comfort is essential. Face coverings are provided and required in specified situations, ensuring they are clean, undamaged, and worn appropriately. Exceptions are made for specific circumstances.

Face coverings will be provided to all employees and are required in the following situations:

- **When required by orders from the CDPH**
- **During outbreaks and major outbreaks**
- **Upon returning to work after having COVID-19**, until 10 days have passed since the onset of symptoms or, if asymptomatic, from the date of the first positive COVID-19 test or after a close contact.

When required per the above periods, face coverings will be clean, undamaged, and worn securely over the nose and mouth.

The following exceptions apply:

1. When an employee is alone in a room or vehicle.
2. While eating or drinking at the workplace, provided employees are at least six feet apart and, if indoors, the supply of outside or filtered air has been maximized to the extent feasible.

3. For employees unable to wear face coverings due to a medical or mental health condition or disability, or for those who are hard of hearing or communicating with a hard of hearing person. These employees shall wear an effective, non-restrictive alternative, such as a face shield with a drape on the bottom, if the condition or disability permits it.
4. During specific tasks which cannot feasibly be performed with a face covering. This exception is limited to the time period in which such tasks are actually being performed.

If an employee is not wearing a face covering due to exceptions (3) and (4), the COVID-19 hazards will be assessed, and appropriate action will be taken to ensure safety.

Employees will not be prevented from wearing a face covering, including a respirator, when not required by this section, unless it creates a safety hazard.

## **Respirators**

Respirators will be provided for voluntary use to employees who request them and work indoors or in vehicles with more than one person. Employees who request respirators for voluntary use will be:

- Encouraged to use them.
- Provided with a respirator of the correct size
- Trained on:
  - Proper wearing of the provided respirator
  - Performing a user seal check according to the manufacturer's instructions each time the respirator is worn.
  - Understanding that facial hair interferes with a proper seal.

## **Ventilation**

To ensure optimal ventilation and air quality, we have implemented the following practices:

- We regularly review CDPH and Cal/OSHA guidance regarding ventilation, including the CDPH Interim Guidance for Ventilation, Filtration, and Air Quality in Indoor Environments.
- We are committed to developing, implementing, and maintaining effective methods to prevent the transmission of COVID-19. This includes taking one or more of the following actions to enhance ventilation:
  - Maximize the supply of outside air to the extent feasible, except when the EPA Air Quality Index is greater than 100 for any pollutant or if opening windows or maximizing outdoor air by other means would cause a hazard to employees (for instance, from excessive heat or cold).
  - In buildings and structures with mechanical ventilation, filter circulated air through filters with a protection level of at least Minimum Efficiency Reporting Value (MERV)-13, or the highest filtration efficiency compatible with the existing system.
  - Use High Efficiency Particulate Air (HEPA) filtration units (in accordance with manufacturer's recommendations) in indoor areas occupied by employees for extended periods, especially where ventilation may be inadequate to reduce the risk of COVID-19 transmission.

- Use High Efficiency Particulate Air (HEPA) filtration units in accordance with manufacturers' recommendations in indoor areas occupied by employees for extended periods where ventilation is inadequate to reduce the risk of COVID-19 transmission.

## **Reporting and Recordkeeping**

We are committed to transparency and informing employees about our efforts to maintain a safe workplace. To achieve this, we utilize **Appendix D - Investigating COVID-19 Cases** to record and track all COVID-19 cases in accordance with Cal/OSHA requirements.

## **Additional Considerations**

### **COVID-19 Outbreaks**

The following guidelines will be implemented if three or more employee COVID-19 cases within an exposed group visited the workplace during their infectious period within a seven-day timeframe (unless CPDH determines a different timeframe):

This will stay in effect for a seven-day period until there are one or fewer new COVID-19 cases detected in the exposed group.

#### **Exclude from Work**

To prioritize safety, all COVID-19 cases and employees with close contacts (who do not undergo COVID-19 testing) will be temporarily excluded from the workplace.

#### **COVID-19 Testing**

Immediate, no-cost COVID-19 testing will be provided to employees (during paid time) within the exposed group, regardless of vaccination status. Testing will continue weekly until one or fewer new COVID-19 cases are detected in the exposed group over a 14-day period.

Employees with close contacts who remain at work will be required to take a COVID-19 test within three to five days after the close contact. Those testing positive will be excluded until they meet return-to-work criteria. Those who chose not to undergo testing will also be excluded until they meet return-to-work criteria.

#### **Face Coverings**

Employees within the exposed group, irrespective of vaccination status, will wear face coverings when indoors or outdoors within six feet of another person unless exceptions outlined in our Program apply.

#### **Respirators**

Employees will be informed of their right to request and receive a respirator for voluntary use, as detailed in our Program.

### **COVID-19 investigation, review, and hazard correction**

We will thoroughly review relevant COVID-19 policies, procedures, and controls, implementing necessary changes to prevent further spread. This includes investigations into new or unabated COVID-19 hazards, and a review of the following:

- Leave policies and practices, ensuring employees are encouraged to stay home when sick
- COVID-19 testing policies
- Adequacy of outdoor air supply to indoor workplaces
- Air filtration measures
- Physical distancing protocols
- A review will occur every 30 days, assessing the ongoing applicability of CCR, Title 8 section 3205.1, responding to new information or previously unrecognized hazards as needed or otherwise necessary
- Implemented changes to reduce the transmission of COVID-19 may include:
  - Increasing outdoor air supply during indoor work
  - Enhancing air filtration systems
  - Augmenting physical distancing measures
  - Requiring respiratory protection
  - Other applicable controls

### **Ventilation**

Mechanical ventilation systems will continue to filter recirculated air with MERV-13 or higher efficiency filters or the highest compatible filtering efficiency if MERV-13 is not feasible. HEPA air filtration units will be used per manufacturers' recommendations in indoor areas occupied for extended periods where ventilation is insufficient to reduce the risk of COVID-19 transmission.

These ventilation requirements will continue to be implemented after the outbreak has passed and CCR, Title 8 section 3205.1 is no longer applicable.

### **Major Outbreaks**

If 20 or more employee COVID-19 cases within an exposed group visit our worksite during their infectious period within a 30-day span, we are committed to taking the following actions, as outlined by CCR, Title 8 section 3205.1:

- All COVID-19 cases and employees within the exposed group who choose not to undergo COVID-19 testing will be excluded from the worksite.
- Employees in the exposed group who remain at work will be tested for COVID-19 at least twice weekly until there are one or fewer new COVID-19 cases detected in the exposed group over a 14-day period. Those not taking the COVID-19 test will be excluded until our return-to-work criteria are met.



- Report the outbreak to Cal/OSHA.
- Provide respirators for voluntary use to employees in the exposed group. Their use will be encouraged, and employees will be trained according to the requirements specified in CCR, Title 8 section 5144(c)(2).
- Employees in the exposed group not wearing respirators as required will be physically separated from others by at least six feet. When six feet of separation is not feasible, alternative methods will be employed, including:
  - Reducing the number of persons in an area at one time, including visitors.
  - Employing visual cues like signs and floor markings to guide individuals on where to be located or the direction/path of travel.
  - Implementing staggered arrival, departure, work, and break times.
  - Adjusting work processes or procedures (e.g., reducing production speed) to allow greater distance between employees.

When it is not feasible to maintain a distance of at least six feet, individuals will be as far apart as feasible.

## Appendix A: Identification of COVID-19 Hazards

Regardless of symptoms or negative COVID-19 test results, all persons 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.

**Person conducting the evaluation:**

**Date:**

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

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

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

If necessary, review any updated information via Cal/OSHA for additional guidance on what to regularly inspect for, including issues that may be more pertinent. You will need to modify form accordingly.

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>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>PPE (not shared, available, and being worn)</b>			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Respiratory protection			

## Appendix C: COVID-19 Training Roster

Date training completed:

Person that conducted the training:

Training materials:

Employee Name (printed)	Signature

## Appendix D: Investigating COVID-19 Cases

We prioritize the confidentiality of personal information, especially concerning COVID-19 cases or individuals with COVID-19 symptoms. We are committed to maintaining your privacy. All personally identifiable information on COVID-19 cases or persons displaying COVID-19 symptoms will be kept strictly confidential. Disclosure of this information will only occur when required or permitted by law. Unredacted information related to COVID-19 cases will be disclosed to the local health department, CDPH, Cal/OSHA, and NIOSH immediately upon their request. We understand the sensitivity of this information, and our commitment to confidentiality is unwavering.

**Date COVID-19 case (suspect or confirmed) became known:**

**Date investigation was initiated:**

**Name of person(s) conducting the investigation:**

### COVID-19 Case Summary

Name	Contact Info	Occupation	Location	Last day and time present	Date of positive test and/or diagnosis	Date of first symptoms

Summary of employees, independent contractors, and employees of other employers that came in close contact  
**CCR Title 8, section 3205 does not require recordkeeping for close contacts. These tables are included to assist employers in keeping track of which close contacts they have notified to meet the notice requirements.**

Name	Contact Info	Date notified	Date offered COVID-19 testing (employees only)

Summary notice of a COVID-19 case (employees, employers, independent contractors) – during the infectious period and regardless of a close contact occurring.

Name	Date notified

Summary notice of a COVID-19 case (authorized representative of the COVID-19 case and employee who had close contact).

Name	Date notified

What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?

What could be done to reduce exposure to COVID-19?

Was local health department notified? Date?

## Appendix E: Notice of Potential Exposure to COVID-19

**Date:**

This notice is to make you aware that you may have potentially been exposed on [date] to an individual who works at this address [provide address if it is not offered elsewhere on the notice] who has been diagnosed or tested positive for COVID-19. We are in the process of identifying persons who may have been in close contact with the individual. Close contacts of an infected individual are at higher risk of contracting the virus.

If you begin to experience symptoms of respiratory illness (fever, coughing, or shortness of breath), please inform [designated individual] at [contact information] and contact your health care provider.

Should you be required by a medical professional to seek a diagnosis or test or to self-quarantine, you may contact [insert name of appropriate individual].

Our policy is not to discriminate or retaliate against any employee seeking to take COVID-19-related leave. All medical information shall be kept confidential and only disclosed if required by law.

For more information on COVID-19, including symptoms and treatment, visit the CDC website at [www.cdc.gov](http://www.cdc.gov).

*This notice may be removed 15 days from the date noted above.*

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