COVID-19 Prevention Program

AchieveKids

January 2021

COVID-19 Prevention Program (CPP) for AchieveKids
This CPP is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace.

Date: 1/25/2021

Authority and Responsibility

Ryan C. Eisenberg, Executive Director, and Julie Ngov, Director of Human Resources, 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.

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

Overview

AchieveKids developed and posted a Continuity Plan in September 2020. This plan outlines a layered safety approach to help mitigate risk for our workforce and our students. The plan was developed in partnership with our workforce, our parents, community stakeholders, and Board of Directors. AchieveKids, an organization which serves students in special education, has aligned our approach to the state Cohort Guidance, limiting total group sizes, creating cohort groups, and ensuring strong safety protocols. In addition, AchieveKids was granted a waiver from Santa Clara County Public Health for in-person schooling. The AchieveKids’ approach to safety has been adjusted over time, as new information has been learned, and as local and state guidance has adjusted. AchieveKids is proud to have brought students back to our campuses in June 2020 after having developed a pilot program, and utilized the time in June and July to better inform our systems of safety moving into the 2021-2022 school year. We are committed to providing essential services to our community in a safe manner.

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- 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.
- Host campus-based safety committee meetings either weekly or every other week to review safety protocols, proposed adjustments, or to problem-solve needs.

Employee participation

Employees and their authorized employees’ representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards. AchieveKids developed our strategy to open schools in spring 2021, followed by a pilot implementation of an in-person school program in June and July 2020. To develop this, meetings were held with AchieveKids’ collective bargaining unit weekly from March through implementation, parent meetings, board committee and full board review, and developing a continuity plan in compliance with state and local guidance. AchieveKids follows “Cohort” guidance, but also has acquired a waiver from Santa Clara County to operate in-person schooling, having had county and state level review of our safety protocols. After
implementation, AchieveKids has continued meeting monthly with the collective bargaining unit, has a campus-based ‘safety committee’ made direct care staff, administrators, and facilities team members. As guidance has evolved, AchieveKids has integrated that guidance into our plan. An example of this is adjusting our existing travel quarantine measures to meet county standards when the county introduced a directive with similar measures.

Employee screening

We screen our employees by implementing daily screening tools according to CDPH guidelines, weekly onsite COVID-19 testing schedules, and providing a self-reporting portal. These include:

• Daily questionnaire to staff and students prior to arrival to campus
• Every other week campus-based COVID-19 testing
• A self-disclosure form available to staff for matters related to travel or close contact notifications

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

Where possible, we ensure at least six feet of physical distancing at all times in our workplace.

AchieveKids has taken a layered approach to ensuring distancing when possible. It should be noted that we do work in a school setting with students in special education, needing and benefiting from support in close proximity at various times. As such, we have developed other safety protocols to help mitigate risk. To assist in our ability to create distancing, and to control our overall density within groups and our campuses, AchieveKids has done the following:

• Non-Program based workforce works primarily remotely, and schedules on-campus time
• Classrooms have been designed in accordance to cohort guidance. Total individuals in a room do not exceed 16 total people, and often are far less. We also assigned multiple rooms/spaces for rooms, depending on total group size and square footage of room.
• Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
• Staggered arrival, departure, work, and break times, for students and the workforce.
• We implemented a controlled growth model, a phase in and phase out model, which enables us to adjust our overall campus density based on local data and trends within the community.
• Created zones on our campus, so individual groups have sections of campus to utilize, limiting any contact between groups
• Marked classrooms and furniture to help create distance in the classroom setting

Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved. See the AchieveKids continuity document, posted on the AchieveKids website for greater details on the layered approach to safety. This document was initially created in September 2020, and has been revised to reflect enhanced measures and updated guidance in January 2021.

Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, outdoors, and less than six feet away from another person, including non-employees, and
where required by orders from the California Department of Public Health (CDPH) or local health department. It is mandatory to wear face coverings on our campuses. All staff and students are given a reusable cloth face covering. Additional face coverings, surgical masks, and face shields are made available daily. These are kept in safety kits in each classroom and at our central front desk. For team members working with students with disabilities who have difficulty wearing and keeping on face coverings, we recommend double masking and have face shields available so that they may be worn in addition to the face coverings/masks. We also implement cleaning protocols when entering and exiting the space of a student without a mask.

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 or students 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/mask, 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: Our service providers (Speech, Mental Health, Occupational Therapists) have the use of plexiglass partitions or outdoor space to deliver their services. Additionally, we’ve added air purifiers to our workspaces, and given an outdoor workspace to all homerooms.

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

- Routine changing of air filters in building HVAC system
- Each room has at least one, and some have multiple air purifiers based on square footage
- Windows are to be kept open where there is the ability to do so
- Every homeroom has been assigned an outdoor workspace in addition to their indoor spaces
- Homerooms have alternative rooms, to help break their classrooms into smaller groups as necessary, to help control given density.

**Cleaning and disinfecting**

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

At AchieveKids, cleaning occurs several times throughout the day, and is a routine part of our practice, inclusive of students, our workforce, and a contracted janitorial crew.

- AchieveKids maintains an ample supply of cleaning materials including, but not limited to disinfectant wipes, hand sanitizer, cleaning solution, paper towels, gloves, etc. These supplies are allocated to various spaces, with reserves kept at both of our campuses.
- AchieveKids has electrostatic sprayers and power washers at both campuses, to either quickly clean/disinfect an area, or for cleaning/disinfecting outdoor playgrounds, benches, tables, equipment, cleaning and hand washing stations, etc.
- AchieveKids teams wipe down, clean, and disinfect areas multiple times during the day, with an emphasis on high-touch points.
- A contracted janitorial crew comes to the campuses nightly for a deeper and more intensive cleaning and disinfecting.
- If we have a known case, we close the areas used off for a set period of time, and then conduct a deep cleaning and disinfecting of the area after the designated closure time elapses.
The workforce participates in training related to cleaning procedures (as well as all our safety provisions) before working on campus, and they receive updated training to strengthen protocols over time.

Should we have a COVID-19 case in our workplace, we will implement the following procedures:

- The positive case will immediately be isolated and sent home. The individual will be provided with isolation instructions, as well as and County Public Health guidelines, information, and resources.
- The cohort group or any identified close contacts that are impacted by the positive COVID-19 case will be notified, and required to quarantine for the duration as required by county guidelines. These individuals will be given quarantine instructions and guidance on testing.
- The space utilized is closed off for at least 24 hours when possible. After that time period, a deep cleaning and disinfecting is conducted by a contracted janitorial crew. All reusable equipment used by the positive case will also be quarantined, cleaned, and disinfected prior to returning to circulation.

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

AchieveKids maintains a large supply of PPE. Through our own purchases as well as support from state allocations, AchieveKids has a supply of disposable face coverings, reusable cloth face coverings, face shields, gloves, hand sanitizers, hand washing stations and so on. Every homeroom maintains a supply, which is refreshed on a regular basis. Given our students, beyond our direct trainings with our workforce, we also have done teaching/training with students on utilization of PPE, including but not limited to Social Stories, lessons, parent support, and sending games/activities home to parents for practice. We also allocated some materials to every family to engage them in our safety processes. PPE is to be used by an individual and not to be shared.

Common use items, such as phones, copy machines, and computer stations are first only used by people within the given cohort group. Second, they are to be cleaned after use, and we keep wipes in designated areas to ensure the on-going cleaning of these items.

AchieveKids maintains transportation guidelines, with limited capacity within any of our company vehicles.

**Hand sanitizing**

In order to implement effective hand sanitizing procedures:

- Handwashing facilities are equipped with soap and hand towels throughout our campuses
- Homerooms have direct or nearby access to sinks or areas to wash and clean hands
- Purchased and strategically placed additional hand washing stations around campuses for more accessibility
- Signs are posted encouraging hand washing, and demonstrating proper hand washing techniques
- Employees are trained on effective and proper handwashing and hand sanitizing techniques
- Employees are encouraged to frequently wash their hands for a minimum of 20 seconds
- Some homerooms maintain a schedule of washing hands, and play music to teach students hand washing routines and the importance of personal hygiene
- Every homeroom and common use areas are supplied with an effective hand sanitizer

**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 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:

- Offered COVID-19 testing at no cost during working hours. We will provide a list of locations within the county that offers free testing.
- Provided information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below. Such information will ALSO be available on our company intranet.

System for Communicating

Our goal is to ensure that we have effective and healthy two-way communication with our community, in a form they can readily understand, and that it includes the following information:

- To whom employees should report COVID-19 symptoms and possible hazards to, and how. Employees have been trained and will continue to receive trainings and reminders on reporting procedures. This includes a self-reporting tool within our intranet, frequent remote trainings, and weekly staff newsletters.
- A reminder that employees can report symptoms and hazards without fear of reprisal. Prior to arrival each day, employees, students, and visitors are required to submit a daily questionnaire about any symptoms they are experiencing. This is reviewed by site Administrators daily, who will consult with Human Resources as needed.
- Procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Plan for providing testing in the event of a workforce exposure or outbreak. We will communicate the need or testing and inform affected employees of the reason for the testing and the possible consequences of a positive test. All confirmed positive cases are communicated out to both defined ‘close contacts’ and ‘non-close contacts’ per state and county definitions and rules. These letters come with accompanying information related to their specific scenario, including but not limited to, quarantine procedures and necessary testing requirements.
- Larger group communications to our school district partners and full parent list receive updates on the progress of our in-person program, notifications of adjustments to our program based on state and local guidance, and direct impacts (if any) to them.
- 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.
- Regular meetings with the full staff, selected groups of staff, and parents are maintained to discuss protocols and the provisions related to COVID-19.

Training and Instruction

AchieveKids has engaged in regular and routine training related to our safety protocols and our systems. This includes monthly staff meetings, regular trainings for those working in-person directly with students, and training refreshers of protocols after school breaks. Our training materials and recorded versions of our trainings are made available on our internal intranet, AchieveNet. In addition to those trainings, we offer links to CDC and State Public Health training and information, so it is readily available to our workforce. 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.
- Information outlining the facts 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.
- Our campus safety plans.
- Utilization of established zones within our campuses.
- Cleaning protocols and procedures on our campuses.
- Engagement with students who struggle to wear masks.
- Engagement with students who may experience challenges and difficulty while at school.
- Van procedures and protocols.
- Rules governing our homerooms, clusters, and the cohort model approach.

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

In addition to our staff training, we also work with our students on learning how they can keep themselves safe, and enrich the overall safety of our campuses. This varies based on student’s individual ability to access materials, but includes reinforcement programs around mask wearing, lessons in hand washing/hygiene, practicing of skills, building cleaning of surfaces and areas into daily routines, and games teaching various hygiene procedures that will benefit our students now, and in their future.

Exclusion of COVID-19 Cases

If 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 until quarantine requirements are met.
  Any person who is confirmed COVID-19 positive will be required to quarantine from our campus, following state and county guidelines.
  Any individual defined as being a ‘close contact’, whether from a COVID-19 case on our campus or through disclosure of a community contact, will be quarantined from our campus in alignment with county and state guidelines.
  Any individual traveling greater than 150 miles from county borders will be quarantined from our campuses in alignment to county and state directives.
  Continuing and maintaining an employee’s earnings, seniority, and all other employee rights and benefits whenever we’ve demonstrated that the COVID-19 exposure is work related. This will be accomplished by offering employer-provided sick leave benefits, federal and local leave entitlements, payment from public/state/insurance sources when applicable, continuation of employer-sponsored benefit programs, etc.
- 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 information about COVID-19 cases at our workplace to our Worker’s Compensation Administrators.
whenever required, and provided any related information requested by the Claims Administrator.

- Report information about COVID-19 cases at our workplace to authorized employee representatives, independent contractors, and other employers present in the workplace (with personal identifying information removed).
- 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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**Ryan C. Eisenberg, Ed.D.**

**Executive Director**

**Date**
Appendix A: Identification of COVID-19 Hazards

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

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

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

**Date:** [enter date]

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

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

[This form is only intended to get you started. Review the information available at www.dir.ca.gov/dosh/coronavirus/ for additional guidance on what to regularly inspect for, including issues that may be more pertinent to your particular type of workplace. You will need to modify form accordingly.]

Date: [enter date]

Name of person conducting the inspection: Lalo Carrillo, Facilities Manager

Work location evaluated: Campus Buildings, Playgrounds, and Parking lot

<table>
<thead>
<tr>
<th>Exposure Controls</th>
<th>Status</th>
<th>Person Assigned to Correct</th>
<th>Date Corrected</th>
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<tbody>
<tr>
<td><strong>Engineering</strong></td>
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<tr>
<td>Barriers/partitions</td>
<td>Inspected</td>
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<tr>
<td>Ventilation (amount of fresh air and filtration maximized)</td>
<td>Inspected</td>
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<td>Additional room air filtration</td>
<td>Inspected</td>
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<tr>
<td>Vehicles</td>
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<tr>
<td>Playground barriers and sanitizing schedules</td>
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<td>Plexi-glass desk shields for clinicians and reception</td>
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<tr>
<td><strong>Administrative</strong></td>
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<tr>
<td>Physical distancing</td>
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<tr>
<td>Surface cleaning and disinfection (frequently enough and adequate supplies)</td>
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<tr>
<td>Hand washing facilities (adequate numbers and supplies)</td>
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<tr>
<td>Disinfecting and hand sanitizing solutions being used according to manufacturer instructions</td>
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<td>[add any additional controls your workplace is using]</td>
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<td>[add any additional controls your workplace is using]</td>
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<tr>
<td><strong>PPE</strong> (not shared, available and being worn)</td>
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<tr>
<td>Face coverings (cleaned sufficiently often)</td>
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<td>Gloves</td>
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<td>Face shields/goggles</td>
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<td>Respiratory protection</td>
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<td>[add any additional controls your workplace is using]</td>
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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: This information is confidentially maintained with Human Resources.

Name of person conducting the investigation: Julie Ngov, Director of Human Resources

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

| All employees who may have had COVID-19 exposure and their authorized representatives. | Date: |
| Names of employees that were notified: |

| Independent contractors and other employers present at the workplace during the high-risk exposure period. | Date: |
| Names of individuals that were 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: |

*Should an employer be made aware of a non-employee infection source COVID-19 status.*
Appendix D: COVID-19 Training Roster

Date: Multiple Training Dates

Person that conducted the training: Julie Ngov, Director of Human Resources

<table>
<thead>
<tr>
<th>Employee Name</th>
<th>Signature</th>
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<tbody>
<tr>
<td>This log is maintained with and updated by the Human Resources Department.</td>
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Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks (3 or more COVID-19 cases within a 14-day period)

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 (20 or more COVID-19 cases within a 30-day period)

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.