

COVID-19 Prevention Program (CPP) for University of San Francisco

This CPP is designed to control exposures to the SARS-CoV-2 virus that causes COVID-19 that may occur in our workplace.

5/5/22: The 3rd version of the ETS only includes updates from Cal-OSHA. These updates do not include the ever-changing CDC, CA Department of Public Health, San Francisco Department of Public Health guidance, as well as the internal policies and procedures of USF.

Preamble:

On March 16, 2020 the San Francisco Department of Public Health (SFDPH) issued the first of what would become a series of health orders. This first order mandated that everyone shelter-in-place at their residence which effectively ended in-person instruction on campus and required the majority of staff and faculty to establish a means to work remotely. Since this time, the University of San Francisco (USF), along with every other business in the City, followed SFDPH and CDC guidelines (in the absence of any other regulatory requirements) to develop what has become our Covid-19 Prevention Program for Higher Education. As a result, all of the infrastructure, and protocols for the identification and evaluation of workplace hazards, inspections for engineering and administrative controls, investigation and tracing of Covid-19 cases, as well as training have been established under these guidelines (which have the force of law) prior to the approval of CCR T8 Sec 3205. As such we have made our best attempt to adapt, going forward, what we have already established to meet the requirements of this regulation.

Revised Emergency Temporary Standards: *Effective January 14, 2022*: The COVID-19 Prevention Emergency Temporary Standards are still in effect. The workplace standards were updated in December 2021 to include minor revisions related to returning to work after close contact*. The revisions are effective starting on January 14, 2022. In addition to these requirements, employers must follow public health orders on COVID-19. The latest order from the CA Department of Public Health on January 5, 2022 requires the use of face coverings by all employees when indoors.

(Effective May 5, 2022) Note: The 3rd iteration of the Cal-OSHA ETS aligned itself with the California Department of Public Health (CDPH) by no longer requiring masks indoors, regardless of vaccination status. However, other face covering provisions of the ETS remain in effect. This includes allowing employees to voluntarily wear face coverings, unless it would create a safety hazard.

This update also deletes the requirement that employees who are exempted from any applicable face covering requirement (such as returning to work following a case or close contact) maintain six feet of social distance from others or be tested weekly. Now employees only need to be tested at least once a week.

*Close Contact Definition:

“Close contact” is now defined as someone “sharing the same indoor airspace” (e.g., home, clinic waiting room, airplane etc.) for a cumulative total of 15 minutes or more over a 24-hour period (for example, three individual five-minute exposures for a total of 15 minutes) during an infected person’s (laboratory-confirmed or a clinical diagnosis) infectious period.

(2) The new language generally eliminates any specific language in the ETS regarding “close contacts” and instead merely cross-references CDPH guidance, simply requiring you to review current guidance and develop policies to prevent transmission by close contacts.

Link to online version of plan:

Date of Plan Creation:12/9/20

Date of Plan Revision: 12/10/20 (draft)

Date of Plan posted on USF website: 12/18/20

Date of 2nd Revision: 3/12/21

Date of 3rd Revision: 8/22/22

Authority and Responsibility

The University's Administration, including the President's Cabinet, 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:

- Conduct workplace-specific evaluations by using **Appendix A: Identification of COVID-19 Hazards form**.
- Document the vaccination status of our employees by having employees upload proof of their COVID-19 vaccination into Workday, which is maintained as a confidential medical record.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- **Develop COVID-19 policies and procedures to respond effectively and immediately to individuals at the workplace who are a COVID-19 case to prevent or reduce the risk of transmission in the workplace.** <https://myusf.usfca.edu/usf-together/leadership/covid-response-protocol>
- 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.

Note: In the third iteration of the Cal-OSHA ETS a new definition of “returned case” was introduced. The newly defined term of “returned case” largely describes employees who previously had COVID-19 and now have natural immunity. “Returned case” is defined to mean a COVID-19 case who returned to work and did not develop any COVID-19 symptoms after returning. A person shall only be considered a “returned case” for 90 days after the initial onset of symptoms or the first positive test (if no symptoms developed). If a period of longer than 90 days is required by CDPH, that period shall apply.

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: Contacting [Human Resources](#) or [Risk Management/EH&S](#) to identify an unsafe work condition for evaluation.

COVID-19 Test - The definition of “COVID-19 test” has been amended by Cal-OSHA in its 3rd iteration of the Emergency Temporary Standards to provide that, to meet the return-to-work criteria, a test may be both self-administered and self-read only if another means of independent verification of the results can be provided (such as a time-stamped photograph of the results).

In addition, testing must be offered to all employees with COVID-19 symptoms regardless of vaccination status.

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:

COVID-19 Positive Individuals

Once given the contact information of a positive COVID-19 case, the assigned contact tracer reaches out to that individual via phone call if a phone number is available. The Contact Tracing Team and the Response Team will make every effort to find a case’s phone number.

The purpose of this call is to gather information from the individual to help the university determine the potential level of exposure of other USF-affiliated individuals. The individual’s personal information will be held strictly confidential. As required by law, the COVID-19 Response Team may disclose the student/employee’s information to public health, school, and legal authorities charged with preventing or controlling communicable diseases.

The contact tracer will use a predetermined script with standard questions to assist in gathering all relevant information. This information is then uploaded into the Contact Tracing Command Center for tracking purposes. This information is securely stored.

All information will be relayed to the San Francisco Department of Public Health for their contact tracing efforts. This is done by calling the Schools-Childcare Hub at 628-217-7499.

Close Contacts

Any close contacts, as identified using SFDPH guidance, of the positive case identified through the tracer’s efforts will then be notified of this and asked to self-quarantine depending on their vaccination status. Information to be found later in the protocol.

Testing

Individuals exhibiting symptoms or have been identified as a close contact and reporting to the COVID-19 Contact Tracing Team will be informed of their options for testing.

Response Protocol

Residential Student

Positive COVID-19 Case

A Residential Student that informs the university that they have tested positive for COVID-19 - either directly through the covidtracing@usfca.edu email, by calling 415-422-7637, or through the daily symptom screening will be required to isolate for a period of time determined by the most recent guidelines established by the San Francisco Department of Public Health.

<https://myusf.usfca.edu/usf-together/leadership/covid-response-protocol>

- If a student is in a Loyola Village apartment they may isolate within their assigned space (any roommate identified as a confirmed close contact will go through the quarantine protocols listed below, and if needed be relocated to a quarantine room).
- If a student is in any other EHS facility they will be relocated to an isolation room pre-identified by Student Housing and Residential Education (SHaRE).

The COVID-19 Response Team will provide the following information to the COVID-19 Care Team who are charged with providing logistical support to relocating the individual student and ensuring that they are set up for isolation:

- Name
- CWID
- Current Residence Hall Room
- Best contact information (ideally phone number and email)

The COVID-19 Care Team will do the following:

1. Identify which unit is available for the student to use for isolation. SHaRE staff will then note that room as unavailable in StarRez.
2. If necessary, retrieve a room access card for the assigned isolation space.
3. A COVID-19 Care Team member will meet the student at their assigned isolation space and give them their access card to gain access to their room.
4. Provide a resource and information guide for appropriate isolation procedures via an email via SHaRE.
5. Work with Bon Appetit/EMGS to inform them of the room that will need food delivered and provide detailed information of the food delivery process and expectations
6. Work with SHaRE, Facilities Management, and Able to ensure rooms are taken offline and cleaned per guidance and best practices
7. Conduct scheduled, periodic check-ins with the student to ensure that their needs are being met and to answer any questions during their isolation
8. Reach out to student to inform them that their isolation period is over per SFDPH guidance
9. Work with Facilities Management and Able for cleaning of isolation room
10. Notifying SHaRE of when the isolation room has been properly cleaned and available for use as an isolation or quarantine room.

Confirmed Close Contact

For a residential student that has been identified as a close contact through either self-reporting or through the contact tracing of a positive case that student may be required to quarantine for a period of time determined by the most recent guidelines established by the San Francisco Department of Public Health. <https://myusf.usfca.edu/usf-together/leadership/covid-response-protocol>

- If the student is a single occupant in a Loyola Village apartment, they may be able to complete their quarantine in their assigned space.
- If the student is in a Loyola Village apartment with other individuals, they will be relocated to a quarantine room pre-identified by Student Housing and Residential Education (SHaRE).
- If a student is in any other EHS facility they may be relocated to a quarantine room pre-identified by Student Housing and Residential Education (SHaRE) or may be approved to quarantine in space with specific common area/restroom restrictions.
- The student will also be provided with COVID-19 testing options for them to take to help determine if they develop COVID-19.

The COVID-19 Response Team will provide the following information to the COVID-19 Care Team who are charged with providing logistical support to relocating the individual student and ensuring that they are set up for isolation:

- Name
- CWID

- Current Residence Hall Room
- Best contact information (ideally phone number and email)

The COVID-19 Care Team will do the following:

1. If needing to relocate, identify which unit is available for the student to use for quarantine. SHaRE staff will then note that room as unavailable in StarRez.
2. If necessary, retrieve a room access card for the assigned quarantine space.
3. A COVID-19 Care Team member will meet the student at their assigned quarantine space and give them their access card to gain access to their room.
4. Provide a resource and information guide for appropriate quarantine procedures via an email from SHaRE.
5. Work with Bon Appetit/EMGS to inform them of the room that will need food delivered and provide detailed information of the food delivery process and expectations
6. Work with SHaRE, Facilities Management, and Able to ensure rooms are taken offline and cleaned per guidance and best practices
7. Conduct scheduled, periodic check-ins with the student to ensure that their needs are being met and to answer any questions during their isolation
8. Reach out to student to inform them that their quarantine period is over per SFDPH guidance
9. Work with Facilities Management and Able for cleaning of quarantine room
10. Notifying SHaRE of when the isolation room has been properly cleaned and available for use as an isolation or quarantine room.

Reporting of Symptoms

A residential student that informs the university that they are experiencing symptoms consistent with COVID-19 will be strongly encouraged to get tested for COVID-19.

A member of the Contact Tracing Team will reach out to those residential students who self-report symptoms to inform them of their options. If the student gets tested, the student is encouraged to provide the result of the test back to the university. A positive test activates the Positive COVID-19 Protocol. For a negative test, the student will be asked to self-isolate in the residence hall room until symptoms resolve.

<https://myusf.usfca.edu/usf-together/leadership/covid-response-protocol>

Should a student refuse to get tested, they will be asked to self-isolate.

Non-residential Student

Positive COVID-19 Case

For a non-residential student that informs the university that they have tested positive for COVID-19, they will be asked to isolate at their off-campus residence for a period of time determined by the most recent guidelines established by the San Francisco Department of Public Health.

A member of the COVID-19 Response Team will do the following:

1. The COVID tracing team will conduct contact tracing and provide a resource and information guide for appropriate isolation procedures
2. Conduct scheduled, periodic check-ins with the student to ensure that their needs are being met and to answer any questions during their isolation
3. Reach out to student to inform them that their isolation period is over per SFDPH guidance

Confirmed Close Contact

For a non-residential student that has identified as a close contact through either self-reporting or through the contact tracing of a positive case, they may be asked to quarantine at their off-campus residence for a period of time determined by the most recent guidelines established by the San Francisco Department of Public Health.

A member of the COVID-19 Response Team will do the following:

1. Provide a resource and information guide for appropriate quarantine procedures
2. Conduct scheduled, periodic check-ins with the student to ensure that their needs are being met and to answer any questions during their quarantine
3. Reach out to student to inform them that their quarantine period is over per SFDPH guidance

Reporting of Symptoms

A non-residential student that informs the university that they are experiencing symptoms consistent with COVID-19 will be strongly encouraged to get tested for COVID-19.

A member of the Contact Tracing Team will reach out to those non-residential students who self-report symptoms to inform them of their options. If the student gets tested, the student is encouraged to provide the result of the test back to the university. A positive test activates the Positive COVID-19 Protocol. For a negative test, the student will be asked to self-isolate until symptoms resolve.

Employees

Positive COVID-19 Case

For an employee that informs the university that they have tested positive for COVID-19, they will be asked to isolate at their off-campus residence for a period of time determined by the most recent guidelines established by the San Francisco Department of Public Health.

The COVID-19 Response Team will provide the following information to Human Resources and who are charged with assisting the individual and ensuring that they are set up for isolation:

- Name
- CWID
- Best contact information (ideally phone number and email)

Human Resources will do the following:

1. Conduct scheduled, periodic check-ins with the employee to answer any questions during their isolation
2. Reach out to the employee to inform them that their isolation period is over per SFDPH guidance

Confirmed Close Contact

For an employee that informs the university that they have been identified as a close contact through either self-reporting or through the contact tracing of a positive case, they will be asked to quarantine at their off-campus residence for a period of time determined by the most recent guidelines established by the San Francisco Department of Public Health

The COVID-19 Response Team will provide the following information to Human Resources and who are charged with assisting the individual and ensuring that they are set up for isolation:

- Name
- CWID
- Best contact information (ideally phone number and email)

Human Resources will do the following:

1. Conduct scheduled, periodic check-ins with the employee to answer any questions during their isolation
2. Reach out to the employee to inform them that their isolation period is over per SFDPH guidance

Reporting of Symptoms

For an employee that informs the university that they have experiencing symptoms consistent with COVID-19 will be strongly encouraged to get tested for COVID-19.

A member of the Contact Tracing Team will reach out to those employees who self-report symptoms to inform them of their options. If the employee gets tested, the employee is encouraged to provide the result of the test back to the university. A positive test activates the Positive COVID-19 Protocol. For a negative test, the employee will be asked to self-isolate until symptoms resolve.

RETURN TO WORK GUIDELINES

Confirmed or Suspected COVID-19 Guidance for Ending Isolation

Please review guidelines with CDPH and/or local quarantine guidance.

Close Contact Guidance to End Quarantine

Please review guidelines with CDPH and/or local quarantine guidance.

Correction of COVID-19 Hazards

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

The correction, time frames assigned and who performs it will be dictated by the nature of the hazard.

The severity of the hazard, as it relates to the physical plant of the building, will be evaluated by the university Environmental, Health and Safety Manager.

Follow-up measures are taken to ensure timely correction.

Control of COVID-19 Hazards

Face Coverings

[Social Distancing & Face Coverings - On Campus - COVID Resources | myUSF](#)

The University is requiring all students, employees, and affiliates on campus who are performing work on any USF campus to follow the requirement of wearing a face covering all times, with limited exception, to cover their nose and mouth. This is an additional public health measure to reduce the spread of COVID-19 in addition to (not instead of) physical distancing, frequent hand cleaning, disinfection of work areas and common spaces, and other everyday preventative measures.

Please note that the Cal-OSHA definition of a “**face covering**” has been amended in the 3rd iteration of the Emergency Temporary Standards to delete the requirement that light does not pass through the mask when it is held up to a light source. This was done to address feedback that even some N95 masks could not meet this requirement.

Disposable face masks are available on campus for those who have forgotten a face covering.

Upon request, employees who are required to work indoors or in vehicles with more than one person may request a respirator for voluntary use from the University.

Exceptions to the face covering requirement include:

- People who cannot wear a face covering for health reasons, including anyone who has been advised by a medical professional not to wear a face covering;
- Anyone who has trouble breathing, is incapacitated, or otherwise unable to remove a face covering without assistance;
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Such employees will wear an effective, non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition permits it. If their condition does not permit it, then the employee will be at least six feet apart from all other persons and either fully vaccinated or tested at least weekly for COVID-19.
- Any worker to the extent wearing a face covering creates a safety hazard at work under established health and safety guidelines;
- While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
- When an employee is alone in a room or a vehicle.
- Employees wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.
- Children 2 years old or younger.

Note: For this Cal-OSHA document (3rd iteration) the definition of “fully vaccinated” has been deleted. This is largely in response to the fact that the face covering provisions of the ETS no longer make a distinction between fully vaccinated employees and unvaccinated employees. However, please keep in mind that vaccination status may still be relevant for other purposes, including under local public health orders.

Facial Covering Accommodations

If a student or employee cannot wear a face covering due to a medical condition or mental health condition or disability or who are hearing-impaired or communicating with a hearing-impaired person, the university will work with those individuals. Students who require an accommodation should contact Student Disability Services (SDS) at sds@usfca.edu and employees who require an accommodation should contact leaves@usfca.edu.

Violations of COVID-19 Safety Protocols

To protect the health and wellness of the greater campus community, the University, under certain circumstances, will implement certain expectations and guidelines related to current events and public health. During Public Health related emergencies, the University will follow guidelines outlined by the San Francisco Department of Public Health (SFDPH) and Centers for Disease Control (CDC).

USF students, staff and faculty are required to comply with all expectations including but not limited to:

- Following all SFDPH guidelines and orders
- Following all USF guidelines and policies, including, but not limited to:
 - Social/physical distancing protocols
 - Requirements to wear a face covering over your nose and mouth
 - Guidelines for events and social gatherings

Other guidelines will include restricting guests on campus; restricting group gathering size, both on and off campus; restricting access to certain spaces within residence halls and dining areas, etc.

Students who violate guidelines will be referred to the Office of Student Conduct, Rights, and Responsibility (OSCRR). Students who fail to follow any of these expectations will meet with OSCRR staff, in which the goal will be to affect change in behavior in order to maintain a safe and healthy campus. Those found responsible will be provided with educational opportunities to correct behavior. Egregious or repeated violations may result in enhanced sanctions, including suspension for the semester or longer.

Any employees found in violation of COVID-19 policies and procedures will be referred to Human Resources. For those employees who are found in violation of policy, if employees do not become immediately compliant, discipline, up to and including termination, will be taken.

Engineering controls (Using Appendix B for indoor locations)

USF has implemented a number of safe practices and controls intended to maximize the health and safety of the university's campus. See the following link:

<https://myusf.usfca.edu/usf-together/on-campus/prevention-program/facilities-reopening-plan>

System for Communicating

- COVID-19 positive test results should be reported directly to the COVID-19 Response Team at covidtracing@usfca.edu or 415-422-7637.
- 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.
- Where testing is not required, employees can access COVID-19 testing via health plan or can contact the San Francisco Department of Public Health or the county that they reside in for testing facility information.
- In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test. **See Consideration #1 and #2 below.**
- 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. See **Control of COVID-19 Hazards** (page 10)

Training and Instruction

We will provide effective training and instruction that includes (mandated for students, and available for all employees):

- 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 (See “Exclusion of COVID-19 Cases” below).
- 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.
- Since COVID-19 is an airborne disease, N95s and more protective respirators protect the users from airborne disease, while face coverings primarily protect people around the user.
 - The conditions where face coverings must be worn at the workplace.
 - Employees can request face coverings and can wear them at work regardless of vaccination status and without fear of retaliation.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- Information on our COVID-19 policies and how to access COVID-19 testing and vaccination, and the fact that vaccination is effective at preventing COVID-19, protecting against both transmission and serious illness or death.

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

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

Please see [CDPH](#) guidance and/or local quarantine guidance.

If you are unable to work remotely, you may be eligible for paid time off through exclusion pay.

If in effect as required by state or local laws/ordinances, the University will provide expanded sick leave for employees who are excluded from work due to COVID-19. For updates please visit, <https://myusf.usfca.edu/human-resources/benefits/time-away>

Employees diagnosed with COVID-19 may be eligible for Short Term Disability (VDI) benefits. VDI benefits will be provided only when employees are deemed temporarily disabled in accordance with the terms of the VDI contract. For more information, please contact leaves@usfca.edu.

○ As required under the Family and Medical Leave Act (FMLA) and the California Family Rights Act (CFRA), and/or any other applicable state or city leave laws, eligible employees will be provided unpaid job-protected and benefit-protected leave. When applicable, regulated leave will run concurrently with time off plans, VDI or any other income replacement benefits

employees might receive while unable to work.

o If an on site employee is diagnosed with COVID-19 that is work related, they can contact leaves@usfca.edu to discuss worker's compensation.

It is not acceptable to make a determination of risk based on age, color, race, country of origin, medical condition or any other protected class. Refer to the [USF Unlawful Harassment and Discrimination policy](#) for more information.

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.

Melissa Diaz, Director of Risk Management
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 that participated: [enter name(s)]

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

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 the form accordingly.]

Date: [enter date]

Name of person conducting the inspection: Joe Murphy, Environmental, Health & Safety

Work location evaluated: [enter information]

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Ventilation* (amount of fresh air and filtration maximized)			
Additional room air filtration*			
[add any additional controls your workplace is using]			
Administrative			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			

<p>[add any additional controls your workplace is using]</p>			
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Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<p>[add any additional controls your workplace is using]</p>			
<p>PPE (not shared, available and being worn)</p>			
<p>Face coverings (cleaned sufficiently often)</p>			
<p>Gloves</p>			
<p>Face shields/goggles</p>			
<p>Respiratory protection</p>			
<p>[add any additional controls your workplace is using]</p>			

*Identify and evaluate how to maximize ventilation with outdoor air; the highest level of filtration efficiency compatible with the existing ventilation system; and whether the use of portable or mounted HEPA filtration units, or other air cleaning systems, would reduce the risk of COVID-19 transmission. Review applicable orders and guidance from the State of California and local health departments related to COVID-19 hazards and prevention have been reviewed, including the CDPH Interim Guidance for Ventilation, Filtrations, and Air Quality in Indoor Environments and information specific to your industry, location, and operations. We maximize the quantity of outside air provided to the extent feasible, except when the United States Environmental Protection Agency (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.

Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or persons with COVID-19 symptoms, and any employee required medical records will be kept confidential unless disclosure is required or permitted by law. Un-redacted information on COVID-19 cases will be provided to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH) immediately upon request, and when required by law.

Date: [enter date COVID-19 case – suspected/confirmed - became known to the

employer] **Name of person conducting the investigation:** [enter name]

Name of COVID-19 case (employee or non-employee*) and contact information: [enter information]

Occupation (if non-employee*, why they were in the workplace): [enter information]

*If we are made aware of a non-employee COVID-19 case in our workplace

Names of employees/representatives involved in the investigation: [enter information]

Date investigation was initiated: [enter information]

Locations where the COVID-19 case was present in the workplace during the high-risk exposure period, and activities being performed: [enter information]

Date and time the COVID-19 case was last present and excluded from the workplace: [enter information]

Date of the positive or negative test and/or diagnosis: [enter information]

Date the case first had one or more COVID-19 symptoms, if any: [enter information]

Information received regarding COVID-19 test results and onset of symptoms (attach documentation): [enter information]

Summary determination of who may have had a close contact with the COVID-19 case during the high-risk exposure period. Attach additional information, including:

- The names of those found to be in close contact.
- Their vaccination status.
- When testing was offered, including the results and the names of those that were exempt from testing because:
 - They returned to work per our return-to-work criteria and have remained symptom free for 90 days (or a different period than 90 days if it is required by a CDPH regulation or order) or, for those that never developed symptoms, for 90 days (or a different period than 90 days if it is required by a CDPH regulation or order) after the initial positive test.
- The names of those close contacts that were excluded per our Exclusion of COVID-19 Cases and Employees who had Close Contact requirements.
- The names of those close contacts exempt from exclusion requirements because:
 - They were fully vaccinated before the close contact and did not develop COVID-19 symptoms, and are required to wear a face covering and maintain six feet of distance from others at the workplace for 10 days following the last date of close contact.
 - They returned to work per our return-to-work criteria and have remained symptom free, and are required to wear a face covering and maintain six feet of physical distance from others at the workplace for 10 days following the last date of close contact.
 - They never developed symptoms and are required to wear a face covering and maintain six

feet of physical distance from others at the workplace for 10 days following the last date of close contact.

[enter information]

Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:

1. All employees who were on the premises at the same worksite as the COVID-19 case during the high-risk exposure period
2. Their authorized representatives (If applicable, the notice required by Labor Code section 6409.6(a) (2) and (c))

Names of employees that were notified:	Names of their authorized representatives:	Date

Independent contractors and other employers on the premises at the same worksite as the COVID-19 case during the high-risk exposure period.

Names of individuals that were notified:	Date

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

[enter information]

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

[enter information]

Was local health department notified? Date?

[enter information]

Appendix D: COVID-19 Training Roster

Date: [enter date]

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

Employee Name	Signature

Appendix E: Documentation of Employee COVID-19

Vaccination Status - CONFIDENTIAL

Employee Name	Fully or Partially Vaccinated^[1]	Method of Documentation^[2]

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[1] Update, accordingly and maintain as confidential medical record. T8CCR section 3205(b)(9) definition of “fully vaccinated” will be applied.

[2] Acceptable options include:

- **Employees provide proof of vaccination (vaccine card, image of vaccine card or health care document showing vaccination status) and employer maintains a copy.**
- **Employees provide proof of vaccination. The employer maintains a record of the employees who presented proof, but not the vaccine record itself.**
- **Employees self-attest to vaccination status and employer maintains a record of who self-attests.**

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

[This addendum will need to be added to your CPP if three or more employee COVID-19 cases within an exposed group visited the workplace during their high-risk exposure period at any time during a 10-day period. Reference section [3205.1](#) for details.]

This addendum will stay in effect until there are no new COVID-19 cases detected in the exposed group for a 10-day period.

COVID-19 testing

Following a "major outbreak," USF is required to make available COVID-19 testing to all employees in the exposed group at least twice a week. Employees in the exposed group shall now be tested or shall be excluded and follow the return-to-work requirements of the ETS.

We provide COVID-19 testing at no cost to all employees, during paid time, in our exposed group except for:

- Employees who were not present during the relevant 10-day period.
- COVID-19 cases who did not develop symptoms after returning to work pursuant to our return-to-work criteria, no testing is required for 90 days after the initial onset of symptoms or, for COVID-19 cases who never developed symptoms, 90 days after the first positive test.

COVID-19 testing consists of the following:

- All employees in our exposed group are immediately tested and then again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine, isolation, or exclusion period required by, or orders issued by, the local health department.
- After the first two COVID-19 tests, we continue to provide COVID-19 testing once a week of employees in the exposed group who remain at the workplace, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 10-day period.
- We provide additional testing when deemed necessary by Cal/OSHA.

We continue to comply with the applicable elements of our CPP, as well as the following:

1. Employees in the exposed group wear face coverings when indoors, or when outdoors and less than six feet apart (unless one of the face-covering exceptions indicated in our CPP apply).
2. We give notice to employees in the exposed group of their right to request a respirator for voluntary use.
3. We evaluate whether to implement physical distancing of at least six feet between persons, or where six feet of physical distancing is not feasible, the need for use of cleanable solid partitions of sufficient size to reduce COVID-19 transmission.

COVID-19 investigation, review, and hazard correction

We 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 is documented and includes:

- 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 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 feasible.
 - Requiring respiratory protection in compliance with section 5144.
 - [Describe other applicable controls].

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, 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, if so, implement their use to the degree feasible.

Additional Consideration #2

Major COVID-19 Outbreaks

[This addendum will need to be added to your CPP should 20 or more employee COVID-19 cases in an exposed group visit your workplace during the high-risk exposure period within a 30-day period. Reference section [3205.2](#) for details.]

This addendum will stay in effect until there are fewer than three COVID-19 cases detected in our exposed group for a 14-day period.

We continue to comply with the Multiple COVID-19 Infections and COVID-19 Outbreaks addendum, except that the COVID-19 testing, regardless of vaccination status, is made available to all employees in the exposed group twice a week, or more frequently if recommended by the local health department.

In addition to complying with our CPP and Multiple COVID-19 Infections and COVID-19 Outbreaks addendum, we also:

- Provide employees in the exposed group with respirators for voluntary use in compliance with section 5144(c)(2) and determine the need for a respiratory protection program or changes to an existing respiratory protection program under section 5144 to address COVID-19 hazards.
- Separate by six feet (except where we can demonstrate that six feet of separation is not feasible and there is momentary exposure while persons are in movement) any employees in the exposed group who are not wearing respirators required by us and used in compliance with section 5144. When it is not feasible to maintain a distance of at least six feet, individuals are as far apart as feasible. [Describe methods used, such as physical distancing that includes: telework or other remote work arrangements; reducing the number of persons in an area at one time, including visitors; 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; and adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.]
- Install cleanable solid partitions that effectively reduce transmission between the employee and other persons at workstations where an employee in the exposed group is assigned to work for an extended period, such as cash registers, desks, and production line stations, and where the physical distancing requirement (described above) is not always maintained.
- Evaluate whether to halt some or all operations at the workplace until COVID-19 hazards have been corrected.
- Implement any other control measures deemed necessary by Cal/OSHA.

Additional Consideration #3

COVID-19 Prevention in Employer-Provided Housing

[This addendum will need to be added to your CPP if you have workers in employer-provided housing. Reference section [3205.3\(a\)](#) for details.]

Assignment of housing units

We, to the extent feasible, reduce employee exposure to COVID-19 by assigning employee residents to distinct groups and ensure that each group remains separate from other such groups during transportation and work. Shared housing unit assignments are prioritized in the following order:

- Residents who usually maintain a household together outside of work, such as family members, will be housed in the same housing unit without other persons.
- Residents who work in the same crew or work together at the same workplace will be housed in the same housing unit without other persons.
- Employees who do not usually maintain a common household, work crew, or workplace will be housed in the same housing unit only when no other housing alternatives are feasible.

Ventilation

We ensure maximization of the quantity and supply of outdoor air and increase filtration efficiency to the highest level compatible with the existing ventilation system in housing units. If there is not a Minimum Efficiency Reporting Value (MERV) 13 or higher filter in use, portable or mounted HEPA filtration units are used, where feasible, in all sleeping areas.

Face coverings

We provide face coverings to all residents and provide information to residents on when they should be used in accordance with state or local health officer orders or guidance.

Screening

We encourage residents to report COVID-19 symptoms to [\[Enter name of individual, position, or office\]](#).

COVID-19 testing

We establish, implement, maintain and communicate to residents' effective policies and procedures for COVID-19 testing of residents who had a close contact. All residents will be tested should there be three or more COVID-19 cases in 14 days.

[\[Describe how this will be accomplished\]](#)

COVID-19 cases and close contacts

We:

- Effectively quarantine residents who have had close contact from all other residents. Effective quarantine includes providing residents who had a close contact with a private bathroom and sleeping area, except for COVID-19 cases who have met our return-to-work criteria and have remained asymptomatic:
 - For 90 days after the initial onset of symptoms,

- For 90 days after the first positive test for COVID-19 cases who never developed symptoms.
- Effectively isolate COVID-19 cases from all residents who are not COVID-19 cases. Effective isolation includes housing COVID-19 cases only with other COVID-19 cases and providing COVID-19 case residents with a sleeping area and bathroom that is not shared by non-COVID-19-case residents.
- Keep confidential any personal identifying information regarding COVID-19 cases and persons with COVID-19 symptoms, in accordance with our CPP Investigating and Responding to COVID-19 Cases.
- End isolation in accordance with our CPP Exclusion of COVID-19 Cases and Return to Work Criteria, and any applicable local or state health officer orders.

Additional Consideration #4

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

[This section will need to be added to your CPP if there is employer-provided motor vehicle transportation to and from work, which is any transportation of an employee, during the course and scope of employment, provided, arranged for, or secured by an employer including ride-share vans or shuttle vehicles, car-pools, and private charter buses, regardless of the travel distance or duration involved. Reference section 3205.4 for details.

This section does not apply:

- **If the driver and all passengers are from the same household outside of work, such as family members.**
- **To employer-provided transportation when necessary for emergency response, including firefighting, rescue, and evacuation, and support activities directly aiding response such as utilities, communications and medical operations.**
- **To employees with occupational exposure as defined by section 5199.**
- **To public transportation.**

Assignment of transportation

To the extent feasible, we reduce exposure to COVID-19 hazards by assigning employees sharing vehicles to distinct groups and ensuring that each group remains separate from other such groups during transportation, during work activities, and in employer-provided housing. We will prioritize shared transportation assignments in the following order:

- Employees residing in the same housing unit will be transported in the same vehicle.
- Employees working in the same crew or worksite will be transported in the same vehicle.
- Employees who do not share the same household, work crew or worksite will be transported in the same vehicle only when no other transportation alternatives are possible.
- At risk and unvaccinated employees should be informed of the risk. The employer must also try to limit the number of those individuals in one vehicle whenever feasible.

Face coverings and respirators

- Cal-OSHA states that employers are required to enforce local health department recommendations. Per the [San Francisco Department of Public Health](#), face coverings are recommended but not required during "public" transportation, i.e. traveling with people outside of your household.
- Upon request, employers shall provide respirators for voluntary use in compliance with subsection to all employees in the vehicle per [OSHA's California Code of Regulations](#).

Screening

We develop, implement, and maintain effective procedures for screening and excluding drivers and riders with COVID-19 symptoms prior to boarding shared transportation.

Ventilation Recommendations:

We ensure that vehicle windows are kept open, and the ventilation system set to maximize outdoor air and not set to recirculate air. Windows do not have to be kept open if one or more of the following conditions exist:

- The vehicle has functioning air conditioning in use and excessive outdoor heat would create a hazard to employees.
- The vehicle has functioning heating in use and excessive outdoor cold would create a hazard to employees. The outside temperature is less than 60 degrees Fahrenheit.
- Protection is needed from weather conditions, such as rain or snow.
- The vehicle has a cabin air filter in use and the U.S. EPA Air Quality Index for any pollutant is greater than 100.

Hand hygiene

We will provide hand sanitizer in each vehicle and ensure that all drivers and riders sanitize their hands before entering and exiting the vehicle. Hand sanitizers with methyl alcohol are prohibited.