

# Model COVID-19 Prevention Program (CPP)

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

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

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

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



November 2020

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

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

## 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. In the eight months 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.

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**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**

## Authority and Responsibility

Melissa Diaz, Director of Risk Management, has overall authority and responsibility for coordinating the provisions of this CPP in our workplace. Joe Murphy, Environmental, Health and Safety Manager is responsible for implementing and maintaining this program. 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 using the **Appendix A: Identification of COVID-19 Hazards** form.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the **Appendix B: COVID-19 Inspections form** as needed to

identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.

### **Employee participation**

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

### **Employee screening**

The Dons Health Check survey is required to be completed by all students and employees that are approved to come to any USF campus. This will keep our on-site population healthy through tracking daily health checks in order to identify any symptoms of illness early on, thereby limiting the viral spread of COVID-19 at USF. The Dons Health Check is located on the USF Mobile application, [myUSF](#) as a persistent banner, and the Student Hub.

Access to university buildings will be tied to the completion of the Dons Health Check with One Card access being granted following completion of the survey. Those individuals not coming to campus are not required to complete the Dons Health Check survey on a daily basis. It is important to note that students and employees will need to both be approved to be on campus and to complete the Dons Health Check to access university buildings.

A [Visitor Questionnaire](#) for approved visitors and vendors will be provided to sponsoring individuals or departments to send to visitors prior to coming to campus.

### **Details of screening**

Employees who come to work at the physical campus (e.g. are not working remotely) must complete a brief Health Screening questionnaire (Dons Health Check) via the USF Mobile App on a cell phone or USFConnect on a computer. The USF Mobile App is available for iPhone and Android. Access to all OneCard swipe and tap electronic locks will be suspended until the Health Screening is completed each day prior to coming to campus. Click on the Health Check-In at the top of the app. This will take you to a screen to sign in with your USF username and password. For security purposes you will be asked to receive a "push" notification via Duo which will present you with the option to tap the large green check box to "**accept**" or the red x box to "deny". The other option is to enter a passcode. At this point you can check the small box to have the system remember your login for 24 hours. You may need to enable cookies to enable remembering of your login.

Once you have accepted you should see a screen called the Dons Health Check which asks the following three questions. The default answer is "no."

- 1) Within the last 10 days have you been diagnosed with Covid-19 or had a test confirming you have the virus?**
- 2) Have you had close contact with a person who has been diagnosed with or is suspected of having Covid-19 within the past 14 days? Note: click the "close contact" link in this question on the app for the current definition.**
- 3) Do you have any of the following symptoms associated with Covid-19 that cannot otherwise be explained?**

As is currently set up, an individual may take the health screen an unlimited number of times to unlock their One Card access. Someone from the COVID-19 Response Team reaches out to every individual who answers Yes to any question to have them further clarify any Yes answers (I accidentally marked Yes, etc.).

### **Symptoms List (from app):**

- Fever, Chills, or Repeated Shaking/Shivering
- Cough
- Sore Throat
- Shortness of Breath, Difficulty Breathing
- Feeling Unusually Weak or Fatigued
- Loss of Taste or Smell
- Muscle Pain
- Headache
- Runny or Congested Nose
- Diarrhea

If you have questions about accessing and completing the Dons Health Check please contact the ITS Help Desk at (415) 422-6888 or by e-mail at [itshelp@usfca.edu](mailto:itshelp@usfca.edu).

As mentioned above the default answer to the three questions is “no.” If you answer yes to any of the three questions your OneCard door access will remain suspended. It is recommended you consult with your physician.

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

The university is currently conducting surveillance testing using rapid COVID-19 tests for student athletes and for those students living in essential housing. As the university permits additional indoor, in-person instruction, those students will be required to participate in these surveillance efforts.

The university is exploring the possibility of conducting PCR surveillance testing for students living on campus, students coming to campus for specialized classwork, and staff, but this type of testing may prove to be cost-prohibitive.

### **Protocols for addressing an outbreak among students or personnel as required by SFPD guidelines**

The University of San Francisco has developed a Response Protocol to guide the university’s response to any instances that impact our on-campus community. These guidelines outline the steps taken for those individuals with confirmed cases, close contact with close contacts, and those individuals who present with symptoms. The current plan addressing this is [The University of San Francisco COVID-19 Response Protocol](#).

### **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 415.554.2830, ext #1 for clinic consult team, then ext #6 for schools.

### **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. Information to be found later in the protocol.

### **Symptomatic Individuals**

The daily symptom screening will help the university identify those individuals that are self-disclosing symptoms that are most commonly associated with COVID-19. Those individuals that disclose that they are exhibiting symptoms will be reached out to by a member of the Contact Tracing Team to encourage them to get a COVID-19 test. It will be asked of those individuals to self-isolate while awaiting test results.

### **Testing**

Individuals exhibiting symptoms will be provided with information on testing sites available throughout San Francisco. The University of San Francisco is actively investigating the possibility of on-site testing for symptomatic individuals.

## **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](mailto: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. [See Appendix D:](#)

- If a student is in a Loyola Village apartment they will isolate within their assigned space (any roommate identified as a confirmed close contact will go through the quarantine protocols listed below).
- 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).

A member of the COVID-19 Response Team will work with the student to notify that student's emergency contact.

The COVID-19 Response Team will provide the following information to the COVID-19 Support 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 Support Team will do the following:

1. Work with SHaRE, if needing to relocate, to identify which unit is available for the student to use for isolation. SHaRE staff will then note that room as unavailable in StarRez.
2. Contact Department of Public Safety to have an officer retrieve a room access card for the assigned space.
3. Public Safety will meet the student at Loyola Village and give them their access card to gain access to their room.
4. Provide a resource and information guide for appropriate isolation procedures
5. Work with Bon Appetit 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 will be required to quarantine for a period of time determined by the most recent guidelines established by the San Francisco Department of Public Health. [See Appendix D.](#)

- If the student is a single occupant in a Loyola Village apartment, they will 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 will be relocated to a quarantine room pre-identified by Student Housing and Residential Education (SHaRE).

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

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

The COVID-19 Support Team will do the following:

1. Work with SHaRE, if needing to relocate, to identify which unit is available for the student to use for isolation. SHaRE staff will then note that room as unavailable in StarRez.
2. Contact Department of Public Safety to have an officer retrieve a room access card for the assigned space.
3. Public Safety will meet the student at Loyola Village and give them their access card to gain access to their room.
4. Provide a resource and information guide for appropriate isolation procedures

5. Work with Bon Appetit 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.

### Reporting of Symptoms

A residential student that informs the university that they are experiencing symptoms consistent with COVID-19 - either directly or through the daily symptom screening - 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. [See Appendix B.](#)

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. 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 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.

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 have experiencing symptoms consistent with COVID-19 - either directly or through the daily symptom screening - 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. [See Appendix B.](#)

## **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 - either directly or through the daily symptom screening - 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. [See Appendix B.](#)

## RETURN TO WORK / SCHOOL GUIDELINES

### Confirmed or Suspected COVID-19 Guidance for Ending Isolation

There are three options for people who have **Confirmed or Suspected COVID-19** to be able to end isolation and return to work or school:

1. **OPTION 1 (Symptom-based criteria):** If you have Confirmed COVID-19 or Suspected COVID-19 and you did not get tested for COVID-19, you can leave isolation and go back to work when all the following are true:
  - a. You have had at least 24 hours with no fever at all; AND
  - b. During those 24 hours you have not taken any fever-reducing medication such as Tylenol, Acetaminophen, Advil, Ibuprofen, Aleve, or Naproxen; AND
  - c. Your symptoms have improved; AND
  - d. It has been at least 10 days since your symptoms first started.

*Note that because people may continue to test positive on a viral test long after they are recovered from COVID-19, you can end isolation if all of a, b, c, and d are true even if you have one or more positive viral tests beyond 10 days after your symptoms first started. If you meet all the criteria for Option 1 you are considered not contagious, even if you have a positive test.*

2. **OPTION 2 (Time-based criteria):** If you have Confirmed COVID-19 but never had symptoms, you can return to work 10 days after the date of your positive test.

If you never had a positive test for the COVID-19 virus (i.e. you do NOT have Confirmed COVID-19) but you had at least one of the symptoms associated with COVID-19, you may be able to go back to work sooner if:

- You get a single negative virus test, AND
- Your symptoms are better, AND
- You have not had a fever for 24 hours.

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### Close Contact Guidance to End Quarantine

After having **Close Contact** with someone who tested positive for COVID-19, you must self-quarantine at home for 14 days to watch and wait to see if you develop symptoms of COVID-19. Do not go to school or work.

If you have had Close Contact and:

- If you do not develop any symptoms, you can end quarantine 14 days after your last close contact with the confirmed COVID-19 case;
- If you get a positive COVID-19 test, then you have Confirmed COVID-19 and you can end isolation using one of the three options described above;
- If you get a negative COVID-19 test, you must still remain in Quarantine for 14 days after your last close contact with the confirmed COVID-19 case

## 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 correction 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. Should corrections be necessary (such as increased ventilation, installation of partitions, etc.) they will be assigned to Facilities. Corrections will be assigned a Work Order number in our system which includes a time frame for correction (e.g. same day, 1 day, 3-5 days, etc.). If Work Orders are not completed within the assigned time frame a supervisor is alerted by the system.

## Control of COVID-19 Hazards

### Physical Distancing

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

- Eliminating the need for workers to be in the workplace – e.g., 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.
- Adjusted work processes or procedures to allow greater distance between employees.
- Reference section 3205(c)(6) for details]

**Restrooms:** The maximum occupancy of restrooms will be posted at each restroom and we ask all users to respect the signage. Please wash your hands thoroughly after using the facilities to reduce the potential transmission of the virus.

**Elevators:** Unless otherwise indicated, elevator capacity will be restricted to no more than two riders. Each rider must position themselves on the marks in corners of the elevator car to promote physical distancing to the greatest extent possible. Signage at the elevators provide the expectations for those in the elevators. Patrons who cannot physically use the stairs because of a disability or medical condition shall have priority for using elevators. Riders should consider using a stylus, key, pencil, or other apparatus to enable touch-free selection of control buttons. Elevator buttons, handrails, and other high touch surfaces shall be wiped down and disinfected twice daily. All riders are encouraged to wash hands thoroughly after riding the elevator to reduce the potential for virus transmission.

**Hallways and Stairwells:** When using hallways and stairwells, please maintain proper distancing. Where possible, Facilities have dedicated separate stairwells and hallways with unidirectional flow with signage to indicate. Please follow the directional signage inside the buildings.

Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

## **Face Coverings**

Following the City and County of San Francisco's public health order on face coverings, 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 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.

### **CAME TO CAMPUS AND FORGOT A FACE COVERING?**

Disposable face masks are available in Gleeson Library during building hours for those who are approved to be on campus and forgot a face covering. They are located just inside the entrance. Completion of the Dons Health Check symptom survey is required for access to the building. For more information see the [Human Resources](#) web site.

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;
- 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.
- 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.

### **Facial Covering Accommodations**

If a student or employee cannot wear a face covering due to a medical condition or disability, the university will work with those individuals to come up with an acceptable solution. Students who require an accommodation should contact Student Disability Services (SDS) at [sds@usfca.edu](mailto:sds@usfca.edu) and employees who require an accommodation should contact [leaves@usfca.edu](mailto: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**

[USF Facilities Department COVID-19 Planning Guide - PAGE 3: Engineering Controls](#)

### **Cleaning and disinfecting**

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

[USF Facilities Department COVID-19 Planning Guide - PAGE 3: Engineering Controls](#)

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

<https://myusf.usfca.edu/facilities>

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users. **See [USF Transportation Protocols](#).**

### **Hand sanitizing**

In order to implement effective hand sanitizing procedures, we:

- Evaluate handwashing facilities.
- Determine the need for additional facilities.
- Encourage and allowing time for employee handwashing.
- Provide employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Encourage employees to wash their hands for at least 20 seconds each time.

### **Personal protective equipment (PPE) used to control employees' exposure to COVID-19**

We evaluate the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, and provide such PPE as needed.

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained. **[reference section 3205(c)(E) for details on required respirator and eye protection use.]**

We provide and ensure use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

## System for Communicating

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

- COVID-19 symptoms in employees should be reported in one of two ways: by answering the third question on the Dons Health Check or by reaching out 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.

- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

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

## Exclusion of COVID-19 Cases

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
- If you cannot come to work as a result of exposure, symptoms or positive test, develop a telework work plan with your supervisor if your position allows for remote work. If you are unable to work remotely, you may be eligible for paid time off through one of the following:
  - The University provides expanded sick leave policies for employees who are excluded from work due to illness/self-isolation/quarantine for COVID-19. Please review time and away options that include SF Public Health Emergency Leave and CA COVID Sick leave. <https://myusf.usfca.edu/human-resources/benefits/time-away> Please contact [leaves@usfca.edu](mailto:leaves@usfca.edu) for more information.
    - If sick and COVID-19 available hours exhaust, employees can use accrued vacation hours.
    - In addition to these benefits, 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](mailto: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 concurrent with time off plans, VDI or any other income replacement benefits employees might receive while unable to work.
    - If you are diagnosed with COVID-19 and believe you were exposed at work, please contact [leaves@usfca.edu](mailto:leaves@usfca.edu) to apply for 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.
- The link to the policy is <https://myusf.usfca.edu/human-resources/training-development/anti-harassment>
- When we have demonstrated that the COVID-19 exposure or diagnosis is work related, employees have access to paid time off hours. As required by San Francisco Ordinance and California Sick Leave laws, employees may be eligible for up to 80 hours of Paid Sick Leave under CA COVID-19 Sick Leave or San Francisco Public Health Emergency Leave in addition to university provided sick and vacation time off or other time off plans available to an employee per their collective Bargaining Agreement (CBA). For more information, please contact [leaves@usfca.edu](mailto:leaves@usfca.edu). In addition to these benefits, 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](mailto:leaves@usfca.edu).

## 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.



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Melissa Diaz, Director of Risk Management 12/18/20



## 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, including barriers, partitions and ventilation

## 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/](http://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: [enter names]

Work location evaluated: [enter information]

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

<b>your workplace is using]</b>			
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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:** [enter date]

**Name of person conducting the investigation:** [enter name(s)]

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

**Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):**

<b>Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:</b>			
<b>All employees who may have had COVID-19 exposure and their authorized representatives.</b>	<b>Date:</b>		
	<b>Names of employees that were notified:</b>		
<b>Independent contractors and other employers present at the workplace during the high-risk exposure period.</b>	<b>Date:</b>		
	<b>Names of individuals that were notified:</b>		
<b>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</b>		<b>What could be done to reduce exposure to COVID-19?</b>	
<b>Was local health department notified?</b>		<b>Date:</b>	

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

## Appendix D: COVID-19 Training Roster

Date: **[enter date]**

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

Employee Name	Signature



## Additional Consideration #1

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

**[This section will need to be added to your CPP if your workplace is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in your workplace within a 14-day period. Reference section 3205.1 for details.]**

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

#### COVID-19 testing

- We will provide COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period. COVID-19 testing will be provided at no cost to employees during employees' working hours.
- COVID-19 testing consists of the following:
  - All employees in our exposed workplace will be immediately tested and then tested again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by, the local health department.
  - After the first two COVID-19 tests, we will continue to provide COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
  - We will provide additional testing when deemed necessary by Cal/OSHA.

#### Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria** requirements, and local health officer orders if applicable.

#### Investigation of workplace COVID-19 illness

We will immediately investigate and determine possible workplace-related factors that contributed to the COVID-19 outbreak in accordance with our CPP **Investigating and Responding to COVID-19 Cases**.

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

In addition to our CPP **Identification and Evaluation of COVID-19 Hazards** and **Correction of COVID-19 Hazards**, we will immediately perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19.

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
  - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
  - Our COVID-19 testing policies.
  - Insufficient outdoor air.
  - Insufficient air filtration.
  - Lack of physical distancing.
- Updating the review:
  - Every thirty days that the outbreak continues.
  - In response to new information or to new or previously unrecognized COVID-19 hazards.
  - When otherwise necessary.

- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We will consider:
  - Moving indoor tasks outdoors or having them performed remotely.
  - Increasing outdoor air supply when work is done indoors.
  - Improving air filtration.
  - Increasing physical distancing as much as possible.
  - Respiratory protection.
  - [describe other applicable controls].

**Notifications to the local health department**

- Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in our workplace, we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- We will provide to the local health department the total number of COVID-19 cases and for each COVID-19 case, the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and North American Industry Classification System code of the workplace of the COVID-19 case, and any other information requested by the local health department. We will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace.

## Additional Consideration #2

### Major COVID-19 Outbreaks (Eric to Review)

**[This section will need to be added to your CPP should your workplace experience 20 or more COVID-19 cases within a 30-day period. Reference section 3205.2 for details.]**

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

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

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

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

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

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

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

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

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

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

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

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

## Additional Consideration #3

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

[This section will need to be added to your CPP if you have workers in employer-provided housing. Reference section 3205.3 for details. Employer-provided housing is any place or area of land, any portion of any housing accommodation, or property upon which a housing accommodation is located, consisting of: living quarters, dwelling, boardinghouse, tent, bunkhouse, maintenance-of-way car, mobile home, manufactured home, recreational vehicle, travel trailer, or other housing accommodations. Employer-provided housing includes a “labor camp” as that term is used in title 8 of the California Code of Regulations or other regulations or codes. The employer-provided housing may be maintained in one or more buildings or one or more sites, including hotels and motels, and the premises upon which they are situated, or the area set aside and provided for parking of mobile homes or camping. Employer-provided housing is housing that is arranged for or provided by an employer, other person, or entity to workers, and in some cases to workers and persons in their households, in connection with the worker’s employment, whether or not rent or fees are paid or collected.]

- This section does not apply to housing provided for the purpose of emergency response, including firefighting, rescue, and evacuation, and support activities directly aiding response such as utilities, communications, and medical operations, if:
  - The employer is a government entity; or
  - The housing is provided temporarily by a private employer and is necessary to conduct the emergency response operations.
- The requirements below for Physical distancing and controls, Face coverings, Cleaning and disinfecting, Screening, and Isolation of COVID-19 cases and persons with COVID-19 exposure do not apply to occupants, such as family members, who maintained a household together prior to residing in employer-provided housing, but only when no other persons outside the household are present.]

#### Assignment of housing units

We will ensure that shared housing unit assignments are prioritized in the following order:

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

#### Physical distancing and controls

We will ensure:

- The premises are of sufficient size and layout to permit at least six feet of physical distancing between residents in housing units, common areas, and other areas of the premises.
- Beds are spaced at least six feet apart in all directions and positioned to maximize the distance between sleepers’ heads. For beds positioned next to each other, i.e., side by side, the beds will be arranged so that the head of one bed is next to the foot of the next bed. For beds positioned across from each other, i.e., end to end, the beds will be arranged so that the foot of one bed is closest to the foot of the next bed. Bunk beds will not be used.
- Maximization of the quantity and supply of outdoor air and increase filtration efficiency to the highest level compatible with the existing ventilation system in housing units.

#### Face coverings

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

### **Cleaning and disinfection**

We will ensure that:

- Housing units, kitchens, bathrooms, and common areas are effectively cleaned and disinfected at least once a day to prevent the spread of COVID-19. Cleaning and disinfecting shall be done in a manner that protects the privacy of residents.
- Unwashed dishes, drinking glasses, cups, eating utensils, and similar items are not shared.

### **Screening**

We will encourage residents to report COVID-19 symptoms to COVID-19 Response Team at [covidtracing@usfca.edu](mailto:covidtracing@usfca.edu) or 415-422-7637.

### **COVID-19 testing**

We will establish, implement, and maintain effective policies and procedures for COVID-19 testing of occupants who had a COVID-19 exposure, who have COVID-19 symptoms, or as recommended by the local health department.

### **Isolation of COVID-19 cases and persons with COVID-19 exposure**

We will:

- Effectively isolate COVID-19 exposed residents from all other occupants. Effective isolation will include providing COVID-19 exposed residents with a private bathroom, sleeping area, and cooking and eating facility.
- Effectively isolate COVID-19 cases from all occupants who are not COVID-19 cases. Effective isolation will include housing COVID-19 cases only with other COVID-19 cases, and providing COVID-19 case occupants with a sleeping area, bathroom, and cooking and eating facility that is not shared by non-COVID-19-case occupants.
- Keep confidential any personal identifying information regarding COVID-19 cases and persons with COVID-19 symptoms, in accordance with our CPP **Investigating and Responding to COVID-19 Cases**.
- End isolation in accordance with our CPP **Exclusion of COVID-19 Cases and Return to Work Criteria**, and any applicable local or state health officer orders.

## **Additional Consideration #4 - See [“USF Guidance on Transportation for USF-owned Vehicles or Contracted Transportation” Protocols](#)**

### **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.]**

#### **Assignment of transportation**

We will prioritize shared transportation assignments in the following order:

- Employees residing in the same housing unit will be transported in the same vehicle.
- Employees working in the same crew or worksite will be transported in the same vehicle.
- Employees who do not share the same household, work crew or worksite will be transported in the same vehicle only when no other transportation alternatives are possible.

#### **Physical distancing and face coverings**

We will ensure that the:

- Physical distancing and face covering requirements of our CPP **Physical Distancing** and **Face Coverings** are followed for employees waiting for transportation.
- Vehicle operator and any passengers are separated by at least three feet in all directions during the operation of the vehicle, regardless of the vehicle’s normal capacity. Vehicle operator and any passengers are provided and wear a face covering in the vehicle as required by our CPP **Face Coverings**.

#### **Screening**

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

#### **Cleaning and disinfecting**

We will ensure that:

- All high-contact surfaces (door handles, seatbelt buckles, armrests, etc.) used by passengers are cleaned and disinfected before each trip.
- All high-contact surfaces used by drivers, such as the steering wheel, armrests, seatbelt buckles, door handles and shifter, are cleaned and disinfected between different drivers.
- We provide sanitizing materials, training on how to use them properly, and ensure they are kept in adequate supply.

#### **Ventilation**

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

conditions exist:

- The vehicle has functioning air conditioning in use and the outside temperature is greater than 90 degrees Fahrenheit.
- The vehicle has functioning heating in use and the outside temperature is less than 60 degrees Fahrenheit.
- Protection is needed from weather conditions, such as rain or snow.
- The vehicle has a cabin air filter in use and the U.S. EPA Air Quality Index for any pollutant is greater than 100.

### **Hand hygiene**

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