

# Los Angeles Pacific College

## 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 the Emergency Temporary Standards 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. Instead, they may create their own program or use another CPP template. Employers can also create a written CPP by incorporating elements of this program into their existing Injury and Illness Prevention Program (IIPP). Cal/OSHA encourages employers to engage with employees in the design, implementation and evolution of their CPP.

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](#)
  - The four [Additional Considerations](#) provided at the end of this program to see if they are applicable to your workplace.
- Additional guidance and resources are available at [www.dir.ca.gov/dosh/coronavirus/](http://www.dir.ca.gov/dosh/coronavirus/)

Version: January 19, 2022

Los Angeles, Pacific College (LAPC) Approved  
Institutional Advisory Committee (IAC) Reviewed

01/19/22

The COVID-19 Prevention Emergency Temporary Standards (ETS) were updated in December 2021, effective 01/14/22. The [latest order from the California Department of Public Health](#) were given on 01/05/22.

Update to reflect the [County Health Officer Order disseminated on 01/07/22](#). Published on the LA County website [Responding to COVID-19 in the Workplace](#) and [Best Practices to Prevent COVID-19: Guidance for Business and Employers](#).

05/18/22

The ETS were updated on April 22, 2022, effective May 8, 2022. Please reference the Memo dated 5/18/22.

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5-9-22: Cal-OSHA COVID-19 has revised the COVID-19 Prevention [Emergency Temporary Standards](#) (ETS) effective May 6, 2022. Employers and workers should refer to the Cal-OSHA ETS as well as the following Cal-OSHA resources:

- [FAQs: Revisions to the COVID-19 Prevention Emergency Temporary Standards \(Updated May 7, 2022\) - FAQs](#)
  - [What Employers Need to Know About the April 21, 2022 Standards](#) (May 6, 2022)
  - [COVID-19 Isolation and Quarantine – What Employers and Workers Need to Know](#) (Updated May 7, 2022)
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Based on the CPP Template version May 2022

# COVID-19 Prevention Program (CPP) for Los Angeles Pacific College

This CPP is designed to control employees' exposures to the SARS-CoV-2 virus (COVID-19) that may occur in our workplace. The President or designee have the overall authority and responsibility for implementing the provisions of this CPP. All employees, especially those in management, are responsible for implementing and retaining the CPP in their assigned

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.

**Date: July 6, 2021**

**Revision Date: 5/18/22**

This document is intended to help all employees to identify COVID-19 exposure risks to workers who are unvaccinated or otherwise at-risk, and to help them take appropriate steps to prevent exposure and infection.

For more information, please reference:

- [Digital COVID-19 Vaccine Record](https://myvaccinerecord.cdph.ca.gov/) is published at: <https://myvaccinerecord.cdph.ca.gov/>
- [Vaccines](#)
  - Check [myturn.ca.gov](https://myturn.ca.gov) or call (833) 422-4255 to get a COVID-19 vaccine appointment or walk-in site.
  - Use the CDC's VaccineFinder to find an appointment or walk-in site near you.
- [AB 685](#)
  - The Governor signed AB 685 on September 17, 2020. It becomes effective on January 1, 2021, and expires on January 1, 2023.
    - [AB 685 Requires Employers To Provide Notice to Employees and Local Health Departments About COVID-19 In The Workplace](#)
    - [AB 685 FAQs from State of California Department of Public Health](#) and [Employer Guidance; Responding to COVID-19 in the Workplace](#)

Five issues about the new requirements passed in AB 685:

## 1. AB 685 is effective of January 1, 2021

The Governor signed AB 685 on September 17, 2020. It becomes effective on January 1, 2021, and expires on January 1, 2023.

## 2. Employer notice requirements for COVID-19 in the workplace

AB 685 also adds Labor Code section 6409.6 which requires employers to report certain instances of COVID-19 in the workplace. The new law requires employers who receive a notice of potential exposure to COVID-19 to provide a written notice to other employees within one day of notice of potential exposure:

- Provide a written notice to all employees and employers of subcontracted employees who were on the premises at the same time as the “qualifying individual” within the “infectious period” that they may have been exposed to COVID-19. “Infectious period” is not formally defined by the statute, but rather refers to the definition provided by the State Department of Public Health. “Qualifying individual” is defined as any person who (1) has a laboratory-confirmed case of COVID-19 as defined by the State Department of Public Health, (2) a positive COVID-19 diagnosis from a license health care provider, (3) a COVID-19-related order to isolate provided by a public health official, or (4) died due to COVID-19, in the determination of a county public health department or “per inclusion in the COVID-19 statistics of a county.”

- The notice must be in a form that is usually used to communicate with employees, and can be by personal delivery, email, or text message as long as the notice is reasonably believed to be received by the employee within one business day of delivery. The notice must be in both English and in the language understood by a majority of employees.
- Provide employees who may have been exposed with information regarding COVID-19 related benefits available under federal, state, and local laws. This information would include workers compensation benefits, COVID-19-related leaves, company sick leave, state-mandated leave, supplemental sick leave, and anti-retaliation and antidiscrimination protections.
- Notify all employees of the disinfection and safety plan that the employer plans to implement and complete in accordance with the guidelines of the Centers for Disease Control.

### **3. Employers must notify the local public health agency of “outbreaks”**

If an employer has an “outbreak” in its workforce, within 48 hours it must notify the local public health agency in the jurisdiction of the worksite of the names, number, occupation and worksite of “qualifying individuals.” An “outbreak” for AB 685 is currently defined as: “[a]t least three probable or confirmed COVID-19 cases within a 14-day period in people who are epidemiologically-linked in the setting, are from different households, and are not identified as close contacts of each other in any other case investigation.”

(see <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/OutbreakDefinitionandReportingGuidance.aspx>).

A “qualifying individual” is defined as any person who (1) has a laboratory-confirmed case of COVID-19 as defined by the State Department of Public Health, (2) a positive COVID-19 diagnosis from a license health care provider, (3) a COVID-19-related order to isolate provided by a public health official, or (4) died due to COVID-19, in the determination of a county public health department or “per inclusion in the COVID-19 statistics of a county.” The employer must also continue to inform the local health department of any subsequent laboratory-confirmed cases of COVID-19 at the worksite.

### **4. Grants Cal-OSHA authority to close workplaces that constitute an “imminent hazard to employees”**

AB 685 amends Labor Code section 6325 to permit Cal-OSHA to close workplaces that “constitute an imminent hazard to employees” due to COVID-19. The closure of a workplace must be limited to the immediate area that the “imminent hazard exists,” and Cal-OSHA cannot prohibit entry to any areas that are outside of the hazard area. Cal-OSHA must post a notice in a conspicuous place at the place of employment making this determination. Entry must still be permitted for eliminating the dangerous condition. AB 685 removes some of the notice provisions that Cal-OSHA usually must comply with before making a determination that a work environment constitutes an imminent hazard when dealing with COVID-19, so employers must be prepared to act immediately if Cal-OSHA designates a worksite or portion of a worksite as a hazard area due to COVID-19.

### **5. Useful State of California issued guidance for employers for dealing with COVID-19 in the workplace**

- [LACDPH Best Practices to Prevent COVID-19 Guidance for Businesses and Employers](#)

**5-12-22:** Cal-OSHA has revised the COVID-19 [Emergency Temporary Standards](#) (ETS), effective May 6, 2022. This best practice has been updated to align with the current ETS. Employers should review the ETS and the [COVID-19 Emergency Temporary Standards Frequently Asked Questions](#) for more details on the current revision of the ETS. Key changes in this guidance include:

- Employers must provide respirators upon request to any employee (regardless of vaccination status) who works indoors or in vehicles with more than one person.
- Employers must offer testing at no cost during paid time to all employees with COVID-19 symptoms.
- For employees who had a close contact with a case at work, employers must exclude employees when required. See [COVID-19 ETS Frequently Asked Questions-Isolation and Quarantine](#)

#### [Prevent and reduce transmission - employees](#)

- [Prevent and reduce transmission - customers](#)

- [Maintain a healthy work environment](#)
- [Maintain a healthy workforce](#)
- [Signage](#)
- [Resources](#)

## Related Resources

- [Health Officer Orders and Protocols](#)
- [Responding to COVID-19 in the Workplace](#)
- [Summary: LA County Ongoing COVID-19 Requirements for Businesses](#)

## Authority and Responsibility

**The President, Mary Yoon, or Designee**, 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.

Five key prevention strategies are essential to safe delivery of in-person instruction and help to prevent COVID-19 transmission in schools:

1. Universal and correct use of [masks](#)
2. [Physical distancing](#)
3. [Handwashing and respiratory etiquette](#)
4. [Cleaning](#) and maintaining healthy facilities
5. [Contact tracing](#) in combination with isolation and quarantine

When providing in-person instruction should prioritize two prevention strategies:

1. Universal and correct use of masks should be required
2. Physical distancing should be maximized to the greatest extent possible.

A layered prevention strategy of community prevention

## Identification and Evaluation of COVID-19 Hazards

We implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Document the vaccination status of our employees by using **Appendix E: Documentation of Employee COVID-19 Vaccination Status**, which is maintained as a confidential medical record.

Determining Vaccine Status within the State of California

Digital COVID-19 Vaccine Record is published at: <https://myvaccinerecord.cdph.ca.gov/>

- By entering a few details below, o get a link to a QR code and digital copy of one's COVID-19 vaccination record. This may serve as proof of vaccination using either the electronic version received from the portal or the card was given at time of vaccination, only an original card shall be accepted.
- Note: A link to a live portal will be generated once the information is entered. Then, a pin is entered a QR code and digital copy of the COVID-19 is displayed. For security and authenticity purposes, employees/students and visitors should have their details prepared in advance.

Note: The Cal/OSHA COVID-19 Emergency Temporary Standards (as of May 8, 2022) do

not require employers to document employee vaccination status. Required protective measures in the Emergency Temporary Standards are the same regardless of the vaccination status of employees.]

- 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

#### Updated Healthcare Infection Prevention and Control Recommendations in Response to COVID-19 Vaccination updated 04/27/21

- Institutions should continue to promote and provide vaccination resources.
  - Maintain a record of the vaccination status of employees/students.
    - Records are maintained separate from personnel and student files to maintain the privacy of the individual.
  - Before allowing entrance to facility, the risks associated with visitation should be explained to employees/students and their visitors so they can make an informed decision about participation.
  - Employees/students should be screened and restricted from visiting, regardless of their vaccination status, if they have: current SARS-CoV-2 infection; symptoms of COVID-19; or prolonged close contact (within 6 feet of an infected person for a cumulative total of 15 minutes or more over a 24-hour period) with someone with SARS-CoV-2 infection in the prior 14 days or have otherwise met criteria for quarantine.  
Employees/students should be counseled about recommended infection prevention and control practices that should be used during the visit (e.g., facility policies for source control or physical distancing).
  - Employees/students and visitors, regardless of their vaccination status, should wear a well-fitting cloth mask, facemask, or respirator
  - Hand hygiene should be performed by the employees/students and the visitors before and after contact.
  - High-touch surfaces in visitation areas should be frequently cleaned and disinfected.
  - Limit the total number of employees/students and visitors on campus at one time in order to maintain recommended infection control precautions.
  - **The safest approach** is for everyone to maintain physical distancing and to wear a face covering.
    - Important note: **"Face covering" means** a surgical mask, a medical procedure mask, a respirator worn voluntarily, or a tightly woven fabric or non-woven material of at least two layers. A face covering has with no visible holes or openings and must, which covers the nose and mouth. A face covering does not include a scarf, ski mask, balaclava, bandana, turtleneck, collar, or single layer of fabric.
- 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 and evaluate unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.
  - Conduct daily health screenings of staff, faculty and students.

#### **Employee participation**

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: Being alert to possible hazards and communicating those potential hazards to their supervisor, or manager.

#### **Employee screening**

We screen our employees and respond to those with COVID-19 symptoms by:

- Employee's self screen according to the CDC website for self-checking:  
<https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/coronavirus-self-checker.html>
  - The online, mobile-friendly tool asks a series of questions, and based on the user's responses, provides recommended actions and resources.
- We screen our employees and students by requiring the completion of daily self-health assessments prior to arriving on campus.
- As of 5/08/22: Face Coverings. Changes were made to face covering requirements (Cal. Code Regs., tit. 8, § 3205(c)(6))
  - Face coverings requirements are the same for all employees regardless of vaccination status.
  - Face coverings are no longer mandatory for unvaccinated workers in all indoor locations.

### **Self-checker from the CDC**

The purpose of the Coronavirus Self-Checker is to help you make decisions about seeking appropriate medical care. This system is not intended for the diagnosis or treatment of disease, including COVID-19.

This project was made possible through a partnership with the CDC Foundation and is enabled by Microsoft's Azure platform. CDC's collaboration with a non-federal organization does not imply an endorsement of any one particular service, product, or enterprise.

To continue using this tool, please agree that you have read and understood the contents of this disclaimer.

### **Do you have any of these life-threatening symptoms?**

- Pale, gray, or blue-colored skin, lips, or nail beds, depending on skin tone
- Severe and constant pain or pressure in the chest
- Difficulty breathing (such as gasping for air, being unable to walk or talk without catching your breath, severe wheezing, nostrils flaring, grunting, or ribs or stomach moving in and out deeply and rapidly as you breathe)
- New disorientation (acting confused)
- Unconscious or very difficult to wake up
- Slurred speech or difficulty speaking (new or worsening)
- New or worsening seizures
- Signs of low blood pressure (too weak to stand, dizziness, lightheaded, feeling cold, pale, clammy skin)
- Dehydration (dry lips and mouth, not urinating much, sunken eyes)

If you answer YES to any of these, please get tested for COVID and seek medical assistance.

**In the last two weeks, have you been in close contact with someone who has COVID-19? —excluding people who have had COVID-19 within the past 3 months.**

You have been in close contact if you have

- a. been within 6 feet of someone who has COVID-19 for a combined total of 15 minutes or more over a 24 hour period **or**
- b. provided care at home to someone who is sick with COVID-19 **or**
- c. had direct physical contact (hugged or kissed) with someone who has COVID-19 **or**
- d. shared eating or drinking utensils with someone who has COVID-19 **or**
- e. been sneezed on or coughed on by someone who has COVID-19

If you answer YES or I don't know to any of these, please get tested for COVID and seek medical assistance.

In the last 10 days, have you experienced any of the symptoms listed below? (check all that apply)

- Fever or feeling feverish (such as chills, sweating)
- Cough
- Mild or moderate difficulty breathing (breathing slightly faster than normal, feeling like you can't inhale or exhale, or wheezing, especially during exhaling or breathing out)

- Sore throat
- Muscle aches or body aches
- Unusual fatigue
- Headache
- New loss of taste or smell
- Congestion or runny nose
- Nausea or vomiting
- Diarrhea
- Other symptoms
- No symptoms

If you answer YES or I don't know to any of these, please get tested for COVID and seek medical assistance.

- Watch for COVID-19 symptoms such as fever, cough, or difficulty breathing for 14 days following an exposure.

If you develop any symptoms, get tested for SARS-CoV-2, and stay home and away from others until:

- it has been 10 days from when your symptoms first appeared and
- you have had no fever for 24 hours without the use of medications and
- your other symptoms of COVID-19 are improving\*

(\*Loss of taste and smell may persist for weeks or months after recovery and need not delay the end of isolation)

If you continue to have no COVID-19 symptoms, you do not need to quarantine or get tested unless recommended or required by your healthcare provider, employer, or public health official

If you continue to have no COVID-19 symptoms, you do not need to quarantine or get tested unless recommended or required by your healthcare provider, employer, or public health official.

Learn about COVID-19 Vaccines How to Protect Yourself and Others When You've Been Fully Vaccinated COVID-19 symptoms

Please also see your local area's website: Los Angeles County Department of Public Health

- [Learn about COVID-19 Vaccines](#)
- [How to Protect Yourself and Others When You've Been Fully Vaccinated](#)
- [COVID-19 symptoms](#)

Please also see your local area's website: [Los Angeles County Department of Public Health](#)

**Click the links below for more information on:**

- [COVID-19 symptoms](#)
- [Post-COVID Conditions](#)
- [When to get tested](#)
- [What your test results mean](#)
- [Protecting yourself and others from getting sick](#)
- [When to quarantine or isolate and for how long](#)
- [What to do if you were around someone with COVID-19](#)
- [Taking care of yourself when you are sick](#)
- [Taking care of someone else who is sick](#)
- [Learn about COVID-19 Vaccines](#)
- [Find COVID-19 vaccine locations near you](#)

Please also see your local area's website: [Los Angeles County Department of Public Health](#)

## Correction of COVID-19 Hazards

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

Control Type	Hazard Assessment & Correction	Person(s) Responsible for Correction(s)	Follow-up to Verify Corrective Action(s)
<b>Engineering</b>	Severe: Does not Meet Protocol/Standards <ul style="list-style-type: none"> <li>• Missing barriers/partitions, lack of recommended ventilation</li> <li>• Report immediately</li> <li>• Corrective actions may include use of alternative space(s) until all engineering hazards are remedied</li> </ul>	Associate Director of Operations and/or designee	Procurement of missing items to be confirmed and timeline sent to Site Supervisor so they are aware when deficiencies will be remedied  Corrective actions to be reported by Site Supervisor once complete to the Facilities Department for verification walkthrough
	Moderate: Meets Protocol/Standards but is being improperly implemented or not used <ul style="list-style-type: none"> <li>• Barriers/partitions improperly placed, air filtration not active when space is in use</li> <li>• Report immediately</li> <li>• Correct immediately</li> </ul>	Site Supervisor	Verify protocols/standards are understood by employees  Work with facilities to conduct follow-up training as needed  Conduct unscheduled/unplanned walkthroughs through spaces to verify required protocols/standards are met
<b>Administrative</b>	Severe: Does not Meet Protocol/Standards <ul style="list-style-type: none"> <li>• Minimum physical distancing requirements are not being met, incomplete cleaning disinfecting, improper use or lack of cleaning/disinfecting supplies</li> <li>• Report immediately</li> <li>• Correct immediately</li> </ul>	All Employees	Provide additional training, supports, equipment to assist in compliance with administrative functions  Conduct walkthroughs with the facilities department as necessary to identify potential locations for new signage, temporary equipment, relocation of furnishings to help reinforce administrative



			requirements
<b>Personal Protective Equipment (PPE)</b>	<p>Moderate: Meets Protocol/Standards but the use of temporary/substitute staff is necessary to complete daily operations</p> <ul style="list-style-type: none"> <li>• Review protocol/standards to ensure compliance</li> <li>• Report non-compliance immediately</li> <li>• Correct immediately</li> </ul>	Student Service Coordinator and/or designee	Provide frequent follow-up with all temporary staff to ensure understanding of all protocol/standards
	<p>Severe: Does not Meet Protocol/Standards</p> <ul style="list-style-type: none"> <li>• Insufficient supply of any necessary PPE or improper use</li> <li>• Report immediately</li> <li>• Correct immediately</li> </ul>	Associate Director of Operations and/or designee	<p>Identify procurement timeline to expand inventory necessary to support long-term operations</p> <p>Maintain accurate PPE log and review at least weekly to monitor supply levels</p> <p>Work with District Nurses to provide training opportunities for the proper use of PPE</p> <p>Work with Site Principals to communicate PPE requirements</p>

	<p>Moderate: Meets Protocol/Standards but supplies are known to be getting low or significant delays are expected for procurement</p> <ul style="list-style-type: none"> <li>• Report immediately</li> <li>• Identify alternatives for procurement or approved methods to extend the useful life of existing inventory in line with the local health care agency's guidance</li> </ul>	<p>Student Service Coordinator and/or designee</p>	<p>Actively monitor PPE supply log to initiate procurements well in advance of potential shortage(s)</p> <p>Report to the Superintendent options that may be considered to extend the useful life of existing PPE, should such a thing be considered</p>
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## 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.
  - Supervisors to manage the rotation of office staff when remote work is conducted in a manner that still allows for the day-to-day operations of the district to be completed as required.
- Remove/reposition furnishings to maintain at least 6-feet of social distance.
- Reducing the number of persons in an area at one time, including visitors.
- Installation of visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Adjusted work processes or procedures, such as implementing the use of electronic signatures to limit the transfer of documents between employees when possible.
- Reference section 3205(c)(6) for details.

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

### Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees that are not fully vaccinated when they are indoors or in vehicles, and where required by orders from the California Department of Public Health (CDPH).

An inventory of face coverings is provided directly on site, as well as a log, to ensure an adequate supply is available for distribution as needed to all employees. Face coverings are required to gain entry to any of our sites and may only be removed when:

- As of 5/8/22: Face Coverings. Changes were made to face covering requirements (Cal. Code Regs., tit. 8, § 3205(c)(6))
  - Face coverings requirements are the same for all employees regardless of vaccination status.
  - Face coverings are no longer mandatory for unvaccinated workers in all indoor locations.

The use of face coverings is still recommended to use by students and staff.

Employees required to wear face coverings in our workplace may remove them under the following conditions:

- When an employee is alone in a room or a vehicle.
- While eating or 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 feasible.
- 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 tested at least weekly for COVID-19.
- Specific tasks that cannot feasibly be performed with a face covering. This exception is limited to the time in which such tasks are being performed.
- As of 5/8/22: The definition of "fully vaccinated" was deleted as this term is no longer used in the regulations. All protections now apply regardless of vaccination status and ETS requirements do not vary based on an employee's vaccination status.

Any employee not wearing a required face covering will be tested at least weekly for COVID-19.

We will not prevent any employee from wearing a face covering when it is not required unless it would create a safety hazard, such as interfering with the safe operation of equipment.

Face coverings will also be provided to any employee that requests one, regardless of their vaccination status.

## Engineering controls

For indoor locations, using Appendix B, we identify and evaluate how to maximize, to the extent feasible, ventilation with outdoor air using the highest filtration efficiency compatible with our existing ventilation system, and whether the use of portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems, would reduce the risk of transmission by:

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

- As of 5/8/22: Partitions/barriers. Employers no longer need to consider the use of barriers or partitions to reduce COVID-19 transmission in outbreaks. These requirements have been deleted. (Cal. Code Regs., tit. 8, § 3205.1(d)(3))

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

- Provide portable HEPA grade air filters all spaces that are sized appropriately based on the air circulation and turnover rate of the mechanical system. Change outfilters regularly with new replacement filters to ensure units operate at maximum efficiency.
- Change all mechanical unit filters, both permanent and temporary, no less than twice per year or after an event that requires an immediate change such as a wildfire or any other event that results in higher than normal airborne toxins.
- Applicable orders and guidance from the State of California and your local health department related to COVID-19 hazards and prevention, including [CDPH's Interim Guidance for Ventilation, Filtration, and Air Quality in Indoor Environments](#).

## Cleaning and disinfecting

- As of 5/8/22: Cleaning and disinfecting requirements were deleted (Cal. Code Regs., tit. 8, § 3205(c)(7))

We still maintain cleaning and disinfecting measures.

We implement the following cleaning and disinfection measures for frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, phones, headsets, bathroom surfaces, and steering wheels:

- Ensuring adequate supplies and adequate time for it to be done properly.
- Informing the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection.

- Each employee is responsible for disinfecting their own area.
- The administration maintains disinfection of common areas.

Should we have a COVID-19 case in our workplace **with three or more employees**, we will implement the following procedures:

- As of 5/18/22: Exclusion of employees who had close contact. The detailed prescriptive requirements for exclusion of employees after close contact have been deleted. Instead, employers must review CDPH guidelines for employees who had close contact and implement quarantine and other measures in the workplace to prevent COVID-19 transmission in the workplace.
  - For more information, please refer to the section on CDPH's Isolation and Quarantine Guidance in the general FAQs, and to Cal/OSHA's fact sheet on quarantine and isolation.
- Exclusion of employees with COVID-19. The requirements for employees who test positive for COVID-19 have been updated to reflect the most recent April 6, 2022 CDPH isolation and quarantine guidelines. Regardless of vaccination status, employees who test positive can return to work after 5 days if the employee has a negative test, symptoms are improving, and they wear a face covering at work for an additional 5 days. Otherwise most employees can return after 10 days. (Cal. Code Regs., tit. 8, § 3205(c)(10)).
- Testing and Exclusion. Employees who had close contacts must test negative or be excluded from the workplace until the return to work requirements for COVID-19 cases in are met. (Cal. Code Regs., tit. 8, § 3205.1(b)(2)(C))
- Notify the local public health department.
- Work to identify contacts, quarantine & exclude exposed contacts for 10 days after the last date the case was present at work while infectious.
- Disinfection and cleaning of classroom and primary spaces where case spent significant time

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

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

- As of 5/08/22: Face Coverings. Changes were made to face covering requirements (Cal. Code Regs., tit. 8, § 3205(c)(6))
  - Face coverings requirements are the same for all employees regardless of vaccination status.
  - Face coverings are no longer mandatory for unvaccinated workers in all indoor locations.

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by staff trained in the proper use of the disinfecting supplies maintained at each site for the prescribed use (i.e. disinfecting wipes for technology versus general disinfecting wipes for basic office supplies).

### **Hand sanitizing**

In order to implement effective hand sanitizing procedures:

- As of 5/08/22: To protect employees from COVID-19 hazards, the employer shall evaluate its handwashing facilities, determine the need for additional facilities, encourage and allow time for employee handwashing, and provide employees with an effective hand sanitizer. Employers shall encourage employees to wash their hands for at least 20 seconds each time. Provision or use of hand sanitizers with methyl alcohol is prohibited.
- We evaluate handwashing facilities.
- Students and staff are required to wash their hands at regular intervals. Regular hand washing is preferred over the use of hand sanitizer and will be reinforced as the preferred method for healthy habits.
  - We encourage students and employees to wash their hands for at least 20 seconds each time.
- Ethyl alcohol-based hand sanitizer has been provided to every classroom and interior facility, with ample refills, and throughout each campus, including custodial offices, to allow for sanitizing when hand washing is not immediately available.
  - Provision or use of hand sanitizers with methyl alcohol is prohibited.
- Signage has been posted at each site that promotes healthy hygiene practices.

## **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 section 3380, and provide and ensure use of such PPE as needed.

Upon request, we provide respirators for voluntary use to all employees who are not fully vaccinated and who are working indoors or in vehicles with more than one person.

As of 5/8/22: Upon request, employers shall provide respirators for voluntary use in compliance with subsection 5144(c)(2) to all employees who are working indoors or in vehicles with more than one person. Whenever an employer makes respirators for voluntary use available, under this section or sections 3205.1 through 3205.4, the employer shall encourage their use and shall ensure that employees are provided with a respirator of the correct size.

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.

We provide and ensure use of respirators in compliance with section 5144 when deemed necessary by Cal/OSHA.

### **Testing of symptomatic employees**

We make COVID-19 testing available at no cost, during paid time, to all employees:

- Who had close contact in the workplace; or
- Who have COVID-19 symptoms, and
- During outbreaks and major outbreaks (see below for further details).

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

We have developed effective procedure to investigate COVID-19 cases that include seeking information from our employees regarding COVID-19 cases, close contacts, test results, and onset of symptoms. This is accomplished by using the **Appendix C: Investigating COVID-19 Cases** form.

As of 5/8/22: We ensure the following is implemented:

- Employees that had a close contact are offered COVID-19 testing at no cost during their working hours, except for returned cases as defined in 3205(b)(11).
- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to these employees.
- Written notice within one business day of our knowledge of a COVID-19 case that people at the worksite may have been exposed to COVID-19. This notice will be provided to all employees (and their authorized representative), independent contractors and other employers on the premises at the same worksite as the COVID-19 case during the infectious period. These notifications will meet the requirements of T8CCR section 3205(c)(3)(B) and Labor Code section 6409.6(a)(4); (a)(2); and (c).
- We consider a "close contact" that meets the definition in section 3205(b)(1), unless it is otherwise defined by CDPH; "infectious period" meets the definition in 3205(b)(9), unless it is otherwise defined by CDPH; and "worksite" meets the section 3205(b)(12) definition.]

## **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:

- Who employees should report COVID-19 symptoms, possible close contacts and hazards to, and how. [Describe how this will be accomplished in your workplace].

- Employees take the CDC Self checker. See earlier reference.
- Employees should report COVID-19 symptoms and possible hazards to Israel Campos, the Associate Director of Operations.
- Employees may 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.
- Employees may access COVID-19 testing at the available testing sites
- Any student, teacher or staff member with COVID-19 symptoms should get tested. Common symptoms include fever, chills, cough, shortness of breath or difficulty breathing, fatigue (feeling tired), muscle or body aches, headache, loss of taste or smell, sore throat, congestion or runny nose, nausea, vomiting or diarrhea. If an individual suspects they have symptoms, they should contact their doctor or health care provider to arrange for evaluation and testing.
- COVID-19 Testing is available at no cost to the employee.
- 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.
- 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.
- That employees can report symptoms, possible close contacts and hazards without fear of reprisal.
- How employees with medical or other conditions that put them at increased risk of severe COVID-19 illness can request accommodations.
  - For any person with a medical disability that exempts them from receiving the vaccine, LAPC will make reasonable accommodations through an interactive process for those with qualifying medical conditions that interfere with vaccination and place them at risk. The individual must submit an affidavit supported by a statement by a licensed health care provider that outlines the medical reason for the exemption which must be connected to contraindications as expressed by the Centers for Disease Control (CDC), the vaccine manufacturer, and/or the individual's physical condition contraindicating immunization. For more information, please reference the LAPC vaccine policy published in the Memorandum dated 10/28/21.
- Access to COVID-19 testing when testing is required. [If you are required to provide testing, have a plan for how this will be accomplished at no cost to the employee during working hours, including when the testing is in response to CCR Title 8 section 3205.1, Multiple COVID-19 Infections and COVID-19 Outbreaks, as well as section 3205.2, Major COVID-19 Outbreaks. It is recommended that the plan be developed in advance for large or high-risk workplaces.]
- The 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.
- **[Describe other aspects of your system of COVID-19 related communication being implemented in your workplace].**
  - Who employees should report COVID-19 symptoms and possible hazards to.
    - Employees and students should notify COVID-19 symptoms to info@lapacific.edu.
  - That employees can report symptoms and hazards without fear of reprisal.
  - Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
  - Where testing is not required, how employees can access COVID-19 testing:
    - Any student, teacher or staff member with COVID-19 symptoms should get tested. Common symptoms include fever, chills, cough, shortness of breath or difficulty breathing. Other less common symptoms can include fatigue (feeling tired), muscle or body aches, headache, loss of taste or smell, sore throat, congestion or runny nose, nausea, vomiting or diarrhea. If an individual suspects they have symptoms, they should contact their doctor or health care provider to arrange for evaluation and testing.

- COVID-19 testing for people with insurance: It is up to each individual to verify information and check with the test site regarding the insurance they take and any co-pays that are expected at time of testing.
- 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.
- Information about COVID-19 hazards employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures.

## Training and Instruction

We provide effective employee training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards, and how to participate in the identification and evaluation of COVID-19 hazards.
- Information regarding COVID-19-related benefits (including mandated sick and vaccination leave) to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
  - COVID-19 is an infectious disease that can be spread through the air.
  - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
  - An infectious person may have no symptoms.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing, face coverings, increased ventilation indoors, and respiratory protection decrease the spread of COVID-19 and are most effective when used in combination.
- The right of employees that are not fully vaccinated to request a respirator for voluntary use, without fear of retaliation, and our policies for providing the respirators. Employees voluntarily using respirators will be trained according to section 5144(c)(2) requirements:
  - How to properly wear them.
  - How to perform a seal check according to the manufacturer's instructions each time a respirator is worn, and the fact that facial hair can interfere with a seal.
- 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. 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 training.

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

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees that had a close contact from the workplace until our return-to-work criteria have

been met, with the following exceptions:

- Employees who were fully vaccinated before the close contact and who do not develop COVID-19 symptoms.
- COVID-19 cases who returned to work per our return-to-work criteria and have remained free of COVID-19 symptoms, for 90 days after the initial onset of COVID-19 symptoms, or for COVID-19 cases who never developed COVID-19 symptoms, for 90 days after the first positive test.
- For employees excluded from work, continuing, and maintaining employees' earnings, wages, seniority, and all other employees' rights and benefits. This will be accomplished by [Describe how your workplace will accomplish this, such as by employer-provided employee sick leave benefits, payments from public sources or other means of maintaining earnings, rights and benefits, where permitted by law and when not covered by workers' compensation. Reference section 3205(c)(9)(C) for exceptions].
- Providing employees at the time of exclusion with information on available benefits.

## Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases and outbreaks at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with 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.
- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
  - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
  - COVID-19 symptoms have improved.
  - At least 10 days have passed since COVID-19 symptoms first appeared.
- COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
  - A negative COVID-19 test will not be required for an employee to return to work.

## Return-to-Work Criteria

We will meet the following return to work criteria for COVID-19 cases and employees excluded from work:

- COVID-19 cases, regardless of vaccination status or previous infection and who do not develop symptoms or symptoms are resolving, cannot return to work until we can demonstrate that all of the following criteria have been met:
  - At least five days have passed from the date that COVID-19 symptoms began or, if the person does not develop COVID-19 symptoms, from the date of first positive COVID-19 test;
  - At least 24 hours have passed since a fever of 100.4 degrees Fahrenheit or higher has resolved without the use of fever reducing medications; and
  - A negative COVID-19 test from a specimen collected on the fifth day or later is obtained; or, if unable to test or the employer chooses not to require a test, 10 days have passed from the date that COVID-19 symptoms began or, if the person does not develop COVID-19 symptoms, from the date of first positive COVID-19 test.
- COVID-19 cases, regardless of vaccination status or previous infection, whose COVID-19 symptoms are not resolving, may not return to work until:
  - At least 24 hours have passed since a fever of 100.4 degrees Fahrenheit or higher has resolved



