

COVID-19 Prevention Program (CPP) for Mission Valley ROP (MVROP)

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

Date: December 18, 2020

Authority and Responsibility

The Director of Business Services 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.

1. System for Communicating to Employees

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:

- All employees should report COVID-19 symptoms and possible hazards to: the Director of Business Services (Bryan Wakefield) either through email (bwakefield@mvrop.org) or by phone (510 657-1865 x 15145).
- Employees may report symptoms and hazards without fear of reprisal.
- Employees who are at an increased risk of severe COVID-19 illness should voice their concerns to their immediate supervisor. Employees may report their concerns without fear of reprisal. All reasonable accommodations will be taken.
- Where testing is not required, employees may access COVID-19 testing either through their healthcare provider, or access the testing sites through Alameda County (<https://covid-19.acgov.org/testing.page>).
- In the event MVROP is required to provide testing because of a workplace exposure or outbreak, MVROP 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 is listed in Section 3 of this document.

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2. Identify, Evaluate and Correct COVID-19 Hazards

MVROP will implement the following in the workplace:

- Conduct workplace-specific evaluations using [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 [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 are encouraged to participate in the identification and evaluation of COVID-19 hazards by participating in the inspection or by alerting the Director of Business Services of the potential hazard by either email (bwakefield@mvrop.org) or by phone (510-657-1865 x 15145).

Employee screening

We screen our employees by having them self-screen according to CDPH guidelines. Additionally, at the entrance to the ROP Center, a non-contact thermometer is available for use.

3. Investigating and Responding to COVID-19 Cases

This will be accomplished by using [Appendix C: Investigating COVID-19 Cases](#) form.

- **Investigate COVID-19 Case in the workplace – determine:** date/time “COVID-19 Case” was last present at worksite; date of COVID-19 test results, and date “COVID-19 Case” had “COVID-19 Symptoms”
- **Determine who may have been exposed and provide:**
 - o Notice to employees of possible exposure and availability of benefits within one (1) business day
 - o Investigate workplace conditions possibly contributing to exposure

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4. Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented on [Appendix B: COVID-19 Inspections](#) form, and corrected in a timely manner based on the severity of the hazard.

The severity of the hazard will be assessed and corrective time frames assigned, accordingly. Follow-up measures will be taken to ensure timely correction.

See Sections 2,3,6,7 and 8 of this document.

5. Effective Training and Instruction to Employees:

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
 - o COVID-19 is an infectious disease that can be spread through the air.
 - o COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
 - o An infectious person may have no symptoms.
- Methods of physical distancing of at least six (6) 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 (6) 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.

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6. Physical Distancing

Where possible, we ensure at least six (6) feet of physical distancing at all times in our workplace by:

- Eliminating the need for all employees to be in the workplace – e.g., teaching staff may either teach from home or from their classroom, clerical office staff may come into the office 50% of the time to cover the ROP Center building.
- The doors of the ROP Center building are locked to the public, thus reducing the number of persons in an area at one time, including visitors.
- Installing visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Adjusting work processes or procedures, such as promoting remote meetings via Zoom or Google Meet to allow for safer collaboration sessions between employees.

Individuals will be kept as far apart as possible when there are situations where six (6) feet of physical distancing cannot be achieved.

7. Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six (6) feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department. Face masks are available in the lobby of the ROP Center building to all employees, contractors, and visitors if needed. If an employee encounters non-employees that are not wearing face coverings, they may ask them to put on a face covering. If they do not comply, leave the area and inform the immediate supervisor.

The following are exceptions to the use of face coverings in our workplace:

- When an employee is alone in a room.
- While eating and drinking at the workplace, employees are at least six (6) feet apart.
- Employees wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- 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. Alternatives will be considered on a case-by-case basis.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six (6) feet apart from all other persons.

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8. Other Controls to Limit COVID-19

Engineering controls

We implement the following measures for situations where we cannot maintain at least six (6) feet between individuals: dividing tape in hallways to separate people as much as possible and install clear dividing partitions at a few targeted locations.

The filters for our HVAC system have been upgraded to the highest possible filtration levels. The filters will need to be changed out more frequently with the upgraded filters. Additionally, the HVAC system will have more frequent maintenance checks.

Cleaning and disinfecting

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

- Ensure adequate cleaning and disinfection supplies available to custodial staff.
- Ensure adequate time for cleaning and disinfection to occur multiple times throughout each workday.

Should we have a COVID-19 case in our workplace, we will implement the following procedures: sequester the COVID-19 case work area for at least 24 hours, and then disinfect the area. Surrounding areas will be disinfected with the disinfecting sprayer.

Shared tools, equipment and personal protective equipment (PPE)

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

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 (e.g. multi-function copiers), the items will be disinfected by custodial staff throughout the day and employees are encouraged to frequently wash their hands or use hand sanitizer.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Encourage and allow time for employee handwashing.
- Encourage employees to wash their hands for at least 20 seconds each time.
- Provide employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Provide hand sanitizer stations throughout the ROP Center campus, in common areas, and in each classroom.

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

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

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained.

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

9. 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 and to representatives of Cal/OSHA immediately upon request.
- Use [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 or as otherwise required by law, with personal identifying information removed.

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10. Exclusion from Workplace & Continuation of Earnings/Benefits

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.
- Continue compensation, rights, and benefits (including seniority and right to return to former job), if excluded employee is able and available to work.
- Exceptions: Right to compensation benefits does not apply if:
 - Employee is unable to work for reasons other than protecting persons in workplace from possible COVID-19 transmission, or
 - Employer demonstrates COVID-19 is not work related
- Compensation/Benefits Sources: Employer may use sick leave and payments from other public sources to maintain compensation and benefits, when not covered by workers' compensation.

11. Exclusion Period for 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; and
 - At least 10 days have passed since COVID-19 symptoms first appeared.
- COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
- A negative COVID-19 test will not be required for an employee to return to work.
- If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.



Director of Business Services

12-18-2020

Date

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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, walkways, elevators, break or eating 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, 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(s) conducting the evaluation: _____

Date: _____

Interaction, area, activity, work task, that poses potential COVID-19 hazard	Places and times	Potential for COVID-19 exposures	Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation

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Appendix B: COVID-19 Inspections

This form will be used on a weekly basis to evaluate potential hazards in the workplace.

Date: _____

Name of person(s) conducting the inspection: _____

Work location evaluated: _____

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Administrative			
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			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			

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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: _____

Name of person(s) conducting the investigation: _____

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

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

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