



## Diocese of Orange

### COVID-19 Prevention Program (CPP)

The Roman Catholic Diocese of Orange recognizes that in operating their business, there are risks of exposure to COVID-19 for employees and customers, as it is highly contagious and has a mortality rate greater than the flu.

In operating, The Diocese of Orange acknowledges the risks of COVID-19 exposure to its employees and customers and is committed to providing a safe and healthy business environment. To ensure that, the following COVID-19 Protection Plan (CPP) has been developed in response to the COVID-19 pandemic. All employees, including managers and staff, are responsible for implementing and complying with all aspects of this Plan to mitigate the potential for transmission of COVID-19 in our workplaces, and requires full cooperation among staff and management. Only through this cooperative effort can the safety and health of all staff and persons in our workplace be maintained and established.

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

**Date: January 27, 2021**

#### **Authority and Responsibility**

The Pastor, Principal and/or Business Manager has overall authority and responsibility for implementing the provisions of this CPP in the workplace. A workplace coordinator will be designated for each location within the Diocese and will be responsible for COVID-19 issues and their impact at the workplace. They will be fully supported by the full administrative team.

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**

The Pastor, Principal and/or Business Manager will implement the following in the 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**

The success of this program requires the full support of each and every employee. Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards. Employees will be apprised of the existence of this program and will be responsible for the immediate reporting to management of any concerns, without fear of reprisal, COVID-19 symptoms, possible COVID-19 exposures, and possible COVID-19 hazards at the workplace.

We inform our employees as part of our initial new employee orientation and then as part of direct, on site, supervisor hosted meetings.

### **Employee screening**

Employees are screened by:

- Self-screening according to CDPH and CDC guidelines
- Temperature measurement using non-contact thermometers when entering the workplace
  - Ensure face coverings used during screening by both screener and employee
- Screening and evaluation of staff who exhibit signs of illness

### **Correction of COVID-19 Hazards**

Each parish and school location within the Diocese of Orange is responsible to identify and evaluate COVID-19 hazards and correction of hazards by conducting periodic COVID-19 related inspections. Diocese locations are notified of efforts to identify COVID hazards through HR communications. Data is collected on the results of the COVID-19 spot checks and presented to management and Senior Leadership. The severity of the hazard will be assessed, and correction time frames assigned, accordingly.

The Pastor, Principal and/or Business Manager follows-up on submitted COVID-19 safety concerns. Leadership of these locations are notified of hazards and unsafe behaviors and expected to resolve them by communication to employees. Repeated COVID-19 safety concerns are elevated to Senior Leadership.

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:

### **Control of COVID-19 Hazards**

#### **Physical Distancing**

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

- Elimination of need for most employees to be in parish and Pastoral Center workplaces.
  - Use of remote telework for most office employees
- Staggered arrival, departure, work, and break times.
- Use of plexiglass barriers
- Visual cues such as signs and floor markers
- Reduced persons in an area by limiting staff and/or prohibiting visitors
- Maximum occupancy established for elevators based on elevator size and signs placed in elevator waiting areas
- Closing of break and lunchrooms
- Maximum capacity established for office and meeting rooms

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

#### **Face Coverings**

Employees are required to wear a face covering when indoors, and when outdoors and less than six feet

away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department. If an employee is unable to provide their own facing covering, we provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth. Face coverings are strategically placed in locations throughout the workplace. Signage is posted through buildings stating the requirement to wear a face covering.

The recommended face covering is a non-medical disposable mask or a cloth mask of two or three layers of tightly woven fabrics. Face shields are not acceptable as a substitute for masks.

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

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
- Employees 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.
- In limited situations where a face covering cannot be used for pedagogical or developmental reasons, a face shield with a drape can be used as long as the wearer maintains physical distance from others.

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 feet apart from all other persons.

### **Engineering controls**

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

- Installation of partitions or plexiglass barriers

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

- Keeping doors and windows open to outside air when possible
- Using economizers, where applicable, for fresh air flow
- Properly maintaining the ventilation system, including changing filters on a regular basis
- Increasing the filtration efficiency to the extent possible for existing ventilation systems
- Upgrading ventilation systems to maximize filtration efficiency when financially possible

### **Cleaning and disinfecting**

Cleaning procedures have been established for all frequently touched surfaces, with specific procedures established for general spaces.

- Adequate supplies and time are allowed for cleaning to be done properly.
- Staff is trained on proper cleaning techniques.
- Daily cleaning and sanitization of offices, restrooms, shared spaces and high touch areas.
- Enhanced cleaning of shared spaces and touched surfaces after each mass, wedding, funeral, school day or other gathering of multiple persons.

For positive COVID-19 cases, decontamination is based on the last day the individual was on site and how long the space can be left unoccupied. CDC recommendations on disinfection are followed after a space was occupied by a COVID-19 positive individual:

<https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>

## **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.

Tools and equipment that must be shared between employees are cleaned and disinfected between users by a cleaning crew and/or the employee.

- Cleaning supplies are provided in each workplace.
- Training is provided on proper cleaning methods.

Hazard assessments have been conducted for all cleaning activities. Appropriate training and PPE recommendations have been shared.

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.

## **Hand sanitizing and Healthy Hygiene Practices**

In order to implement effective hand sanitizing procedures, we:

- Promote frequent and thorough hand washing, by providing workers, customers, and worksite visitors with a place to wash their hands. If soap and running water are not immediately available, alcohol-based hand rubs containing at least 60% alcohol are provided.
- Provide proper handwashing education to employees.
- Locate hand sanitizer stations throughout every building.
- Encourage employees to wash their hands for at least 20 seconds each time
- Post signage in restrooms
- Allow time for employee handwashing
- Personal hygiene practices including frequent and thorough handwashing, sneezing into a tissue or elbow, avoiding touching one's face and daily cleaning and disinfecting of one's workplace are stressed.

## **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.

Based on the hazard assessments conducted for cleaning activities, appropriate PPE has been recommended and has been provided to custodial employees. Disposable nitrile gloves and face coverings are required to be worn when performing cleaning activities.

- Janitorial employees wear masks and gloves, provided by our janitorial vendor.

## **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:

- Notified by their supervisor, maintaining confidentiality of the COVID-19 case
- Offered COVID-19 testing at no cost during their working hours.
- Human Resources policies and practices will be administered consistent with public health recommendations and are consistent with existing state and federal workplace laws (since these policies are changing frequently d/t COVID-19)

## 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:

- Employees who have symptoms (i.e., fever, cough, or shortness of breath) should notify their supervisor and stay home
- Employees can report symptoms and hazards without fear of reprisal.
- Personal identifying information of COVID-19 cases or persons with COVID-19 symptoms shall be kept confidential.
- Employees are directed to Orange County Health Agency to access COVID-19 testing <https://occovid19.ochealthinfo.com/covid-19-testing>
  - COVID-19 testing is provided at no charge to the employee
- Contact tracing techniques will be used to identify source of exposure when there has been a COVID-19 case at the place of employment:
  - Positive cases will be report edto OC Health Agency
- All staff working in close proximity or having direct contact with the COVID-19 case during the previous three business days are notified and encouraged to see their health care professional.
- Investigation will be made to determine whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure to COVID-19 hazards.
- 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.
- Employees who are well but who have a sick family member at home with COVID-19 should notify Human Resources for direction.
- Information about COVID-19 hazards which employees may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures will be communicated.
- Procedures and/or policies fare in place for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
  - Offer remote/telework if applicable to the position
  - Offer sick time or FMLA leave if the employee is eligible

## Training and Instruction

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.
  - Human Resources policies and practices will be administered consistent with public health recommendations and are consistent with existing state and federal workplace laws (since these policies are changing frequently d/t COVID-19)
- 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.

In addition to onsite, supervisor hosted meetings,

- Recordings of instructional webinars produced by the Diocese are posted at <https://rcbo.org/focus/videos/> and <https://extrasite.rcbo.org/>
- Our vendor created the instructional video in English and Spanish for parishes to use to train staff.

**Appendix D: COVID-19 Training Roster** will be used to document this training at each location within the Diocese of Orange.

## 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 10 days after the last known COVID-19 exposure to a COVID-19 case or per medical directive.
- Maintaining all employee rights and privileges per sick time and leave of absences policies of the Diocese during any COVID related illnesses.
- Providing employees at the time of exclusion with information on available benefits.

## Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the Orange County Health Agency 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.

## Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
    - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
    - COVID-19 symptoms have improved.
    - At least 10 days have passed since COVID-19 symptoms first appeared.
  - COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
  - A negative COVID-19 test will not be required for an employee to return to work.
  - If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.
- 

Signed: \_\_\_\_\_

Thomas J. Burnham  
Chief Human Resource Officer  
Roman Catholic Diocese of Orange

Date: \_\_\_\_\_

July 28, 2021

Each Diocese parish or school site has developed their own protocols to meet the requirements of Appendices A-D below:

- Appendix A: Identification of COVID-19 Hazards
- Appendix B: COVID-19 Inspections
- Appendix C: Investigating COVID-19 Cases
- Appendix D: COVID-19 Training Roster

**These guidelines are to be used in conjunction with the protocols already implemented and followed at each location.**

**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



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

## Appendix B: COVID-19 Inspections

Use this in conjunction with the safety and inspection protocol already implemented and followed at your location?

[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			

<p>[add any additional controls your workplace is using]</p>			
--	--	--	--

## Appendix C: Investigating COVID-19 Cases

Use this form in conjunction with Orange County Health Agency requirements.

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

## Supplemental considerations on serious outbreaks

### 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

[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 make testing available 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 Orange County Health Agency**.