

COVID-19 Prevention Program (CPP)

With some exceptions, all employers and places of employment are required to establish and implement an effective written COVID-19 Prevention Program (CPP) pursuant to an Emergency Temporary Standard in place for COVID-19 (California Code of Regulations (CCR), Title 8, section <u>3205</u>(c)).

- All of the elements that may be required in the following CCR, Title 8 sections:
 - o <u>3205, COVID-19 Prevention</u>
 - o 3205.1, Multiple COVID-19 Infection and COVID-19 Outbreaks
 - o <u>3205.2, Major COVID-19 Outbreaks</u>
- <u>Revisions to the COVID-19 Prevention Emergency Temporary Standards FAQs</u>



May 2022

COVID-19 Prevention Program (CPP) for Fullerton Joint Union High School District

This CPP is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace. The novel coronavirus, SARS-CoV-2, causes a viral respiratory illness called COVID-19, which can make people sick with flu-like and other symptoms. The <u>virus spreads</u> easily when an infected person sneezes, coughs, or speaks, sending tiny droplets into the air. These droplets can land in the nose, mouth, or eyes of someone nearby and cause illness. The virus can also be caught from airborne virus, when small particles of infectious virus remain suspended in the air and people inhale them. People can also become infected if they touch an infectious droplet on a surface and then touch their own nose, mouth, or eyes.

Some of the <u>symptoms</u> of COVID-19 are cough, fever, shortness of breath, and new loss of taste or smell. Some people with mild cases may have no symptoms at all yet still can spread the virus. Staying at least six feet away from people outside of your household, covering your nose and mouth with a face covering, and washing hands often with soap and water can help stop COVID-19 from spreading in the workplace. FJUHSD is committed to maintaining a safe and healthy work environment for each employee and ensures full compliance with all applicable occupational safety and health regulations. In conjunction with FJUHSD's Injury and Illness Prevention Plan (IIPP) complies with the Cal/OSHA requirement to develop a written IIPP (CCR Title 8, Section 3203) and includes all required elements.

Date: May 10, 2022

Authority and Responsibility

The Superintendent 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.

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department (OCHCA) related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the **Appendix B: COVID-19 Inspections form** as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by **contacting Site Administrator or Designee**. We encourage employees to participate in this evaluation process.

Correction of COVID-19 Hazards

We select and implement feasible control measures to minimize or eliminate employee exposure to COVID-19. We review orders and guidance COVID-19 hazards and prevention from the State of California Department of Public Health and the local health department (Orange County Health Care Agency), including general information and information specific to our industry, location, and operations. We correct unsafe or unhealthy conditions, work practices, policies, and procedures in a timely manner based on the severity of the hazard.

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:

• Site Administrator or Designee will complete the Appendix B: COVID-19 Inspections on a monthly basis or as needed

Control of COVID-19 Hazards

Physical Distancing

Physical distancing and barriers are no longer required (except during outbreaks), but all employees will be encouraged to wear a well fitting face mask (N95, KN95, KF94).

Face Coverings

We provide clean, undamaged face coverings and strongly recommend they are worn by employees over the nose and mouth 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 (OCHCA). Personal Protective Equipment (PPE) will be provided to staff (and students if they do not have them) in accordance with OCHCA guidelines.

The District will provide filtering facepiece respirators (i.e., N95 masks) for their voluntary use to all employees.

• Masks are strongly encouraged for everyone, regardless of vaccination status, following CDPH Guidance for Individuals on Face Coverings working in K-12 schools, childcare and other youth settings.

Engineering controls

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

- HVAC Units: all units have been modified to accommodate maximum volume of exterior air flow; MERV 13 filters installed by District in HVAC equipment
- The District has disabled demand-controlled ventilation (DCV) on systems where possible.
- This will create a constant flow of fresh outside air throughout the day, where previously the rates were varied based on demand.
- The District has increased the delivery of fresh, filtered, conditioned outside air being delivered via the air conditioning into the classrooms to a rate of 450 cfm to 650 cfm (cfm = cubic feet per minute) depending on room size. This is roughly 3 to 4 1/2 complete air changes per hour in the classroom.
- The District has increased the dilution ventilation at Sonora High School in the Commons Area by adding two large exhaust fans.
- Lastly, the District has installed MERV 13 filters in every HVAC unit Districtwide.

Cleaning and disinfecting

We implement the following cleaning and disinfection measures for frequently touched surfaces: workplace-specific measures, including:

- FJUHSD will ensure sites are provided with sanitary products stored in Warehouse (including sanitizer, face masks, gloves, etc.)
- Cleaning supplies will be distributed by Facilities thru the DSC and delivered to each site.
- 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.
- EPA-approved and COVID-recommended disinfectant product provided in each classroom
 - The District is using disinfecting products for use against COVID-19 on the Environmental Protection Agency (EPA- approved list "N")
- Custodians will follow product instruction and <u>OSHA requirements</u> including proper ventilation during cleaning and disinfecting.
- Buses to be thoroughly cleaned and disinfected.
- Post signs emphasizing basic infection-prevention measures, including hand-washing signs in restrooms, as recommended by CDC.

Should we have a COVID-19 case in our workplace, we will implement the following procedures:

• Thorough cleaning and disinfection of areas visited or touched by an individual with a confirmed case of COVID-19.

Shared tools, equipment and personal protective equipment (PPE)

Personal Protective Equipment (PPE) will be provided upon request to staff and students if they do not have them, in accordance with OCHCA guidelines. 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, the items will be disinfected between uses by providing the employees with the following:

- Disinfectant products are available for both staff and students to disinfect classroom surfaces as needed.
 - The disinfectant product provided has a 45 second dwell time and requires no PPE
 - Students will also have the option to wipe down their work space
- Custodial staff to clean and disinfect high traffic areas throughout the day using Environmental Protection Agency (EPA) approved/recommended for COVID-19 products, by custodial staff, teachers and/or students.
 - o Daily cleaning by custodial staff
 - Clean and disinfect high traffic and high contact areas by trained custodial staff including student desks, doors, handrails, light switches, desktop computers, countertops, pull handles, faucets, paper dispensers, toilets, air dryer, sinks, etc.
- Shared equipment transferred between students and/or staff will be regularly cleaned and sanitized.
- The following PPE will be provided for Custodial Staff, Food Service Workers, Nurses (RN/LVN), Instructional Aides, and any other staff working closely with those who may be ill:
 - \circ Gloves
 - Face Shields
 - N95 Masks
 - Aprons and/or Coveralls
 - Shoe covering (when requested)
 - Clear face masks

**Food Service Workers will utilize single-use disposable PPE.

• 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.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we have established the following: procedures:

- Touchless hand sanitizer readily available in classrooms, hallways, offices and high traffic areas.
- Providing employees with an effective hand sanitizer, and prohibiting hand sanitizers that contain methanol (i.e. methyl alcohol).
- Encouraging employees to wash their hands for at least 20 seconds each time.

Investigating and Responding to COVID-19 Cases

This will be accomplished by using the **Appendix C: Investigating COVID-19 Cases** form or <u>COVID</u>. <u>Notification and Protocol form</u>.

Employees who had potential COVID-19 exposure in our workplace will be provided:

• COVID-19 testing available at no cost to employees with COVID-19 symptoms during employees' paid time.

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 and possible hazards to, and how: School Site Immediate Supervisor/Administrator or Designee
- 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
 - Through their own healthcare provider
 - o Through County- offered COVID-19 Testing
 - Through <u>RapidCovidLabs</u> at no cost for employees
- 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.
 - If notification is required, FJUHSD will send information to those impacted in accordance with OCHCA agency guidelines in regards to reporting.
 - Group Notification Letters
 - o Rapid Covid Labs testing at no cost for employees
- The District will follow OCHCA guidance regarding notification and isolation guidance.
- If additional measures need to be taken, we will follow the state and local guidelines and recommendations.

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.
- 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.
- How the vaccine is effective at preventing COVID-19 and 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

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

- Following CDPH and OCHCA guidelines and recommendations regarding COVID-19 <u>cited on this</u> <u>FJUHSD COVID Guidance for staff document</u>
- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Ensuring employees with COVID-19 exposure are informed of the latest guidance regarding exposures as identified by State and Local Health Jurisdictions
 - Staff: (1) regardless of vaccine status to test 3-5 days after exposure, (2) monitor symptoms for 10 days, (3) wear a mask while indoors and (4) self-isolate should symptoms begin.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related.
- 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 local health department (OCHCA) 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 California Code of Regulation (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 with/without symptoms will not return to work until all the following have occurred:
 - At least 24 hours have passed since a fever of 100.0 or higher has resolved without the use of fever-reducing medications.
 - COVID-19 symptoms have improved.
 - At least 5 days have passed since COVID-19 symptoms first appeared/positive test and the case has a negative (antigen preferred) COVID test and case continues to wear a well-fitted face mask through their 10th day of infection; OR
 - $\circ~$ At least 10 days have passed since COVID-19 symptoms first appeared/positive test
- COVID-19 cases with COVID-19 without symptoms will not return to work until all the following have occurred:
 - At least 5 days have passed since the COVID-19 positive test and the case has a negative (antigen preferred) COVID test and case continues to wear a well-fitted face mask through their 10th day of infection; OR
 - o At least 10 days have passed since COVID-19 symptoms first positive test
 - Case remains without symptoms
- A negative COVID-19 test will not be required for an employee to return to work **if they self-isolated for 10 days**
- 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 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.

Dr. Steve McLaughlin Superintendent

5/10/2022

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, trainings, 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 stationary work.

Person conducting the evaluation: [enter name(s)] Date: [enter date]

Name(s) of employee and authorized employee representative that participated: [enter name(s)]

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

Appendix B: COVID-19 Inspections

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
Engineering			
Ventilation* (amount of fresh air and filtration maximized)			
Additional room air filtration*			
[Add any additional controls your workplace is using]			
Administrative			
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]				
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Exposure Controls	Status	Person Assigned to Correct	Date Corrected
[Add any additional controls your workplace is using]			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
[Add any additional controls your workplace is using]			

*Identify and evaluate how to maximize ventilation with outdoor air; the highest level of filtration efficiency compatible with the existing ventilation system; and whether the use of portable or mounted HEPA filtration units, or other air cleaning systems, would reduce the risk of COVID-19 transmission. Review applicable orders and guidance from the State of California and local health departments related to COVID-19 hazards and prevention have been reviewed, including the CDPH Interim Guidance for Ventilation, Filtrations, and Air Quality in Indoor Environments and information specific to your industry, location, and operations. We maximize the quantity of outside air provided to the extent feasible, except when the United States Environmental Protection Agency (EPA) Air Quality Index is greater than 100 for any pollutant or if opening windows or maximizing outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.

Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or persons with COVID-19 symptoms, and any employee required medical records will be kept confidential unless disclosure is required or permitted by law. Un-redacted information on COVID-19 cases will be provided to the local health department, CDPH, Cal/

OSHA, the National Institute for Occupational Safety and Health (NIOSH) immediately upon request, and when required by law.

Date: [enter date COVID-19 case – suspected/confirmed - became known to the employer] Name of person conducting the investigation: [enter name]

Name of COVID-19 case (employee or non-employee*) and contact information: [enter information] Occupation (if non-employee*, why they were in the workplace): [enter information]

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

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

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

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

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

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

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

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

- The names of those found to be in close contact.
- Their vaccination status.
- When testing was offered, including the results and the names of those that were exempt from testing because.
 - They were fully vaccinated before the close contact and do not have symptoms.
 - They returned to work per our return-to-work criteria and have remained symptom free for 90 days or, for those that never developed symptoms, for 90 days after the initial positive test.
- The names of those that were excluded per our Exclusion of COVID-19 Cases and Employees who had Close Contact requirements.
- The names of those exempt from exclusion requirements because:
 - They were fully vaccinated before the close contact and did not develop COVID-19 symptoms.
 - They returned to work per our return-to-work criteria and have remained symptom free for 90 days or, for those that never developed symptoms, for 90 days after the initial positive test.

[enter information]

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

1. All employees who were in close contact

2. Their authorized representatives (If applicable, the notice required by Labor Code section 6409.6(a)

(2) and (c))

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

Independent contractors and other employers present at the workplace during the high-risk exposure period.

Names of individuals that were notified:	Date

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

[enter information]

Was local health department notified? Date? [enter information]

Appendix D: COVID-19 Training Roster

Date: [enter date]

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

Employee Name	Signature

Appendix E: Documentation of Employee COVID-19 Vaccination Status - CONFIDENTIAL

Employee Name	Fully or Partially Vaccinated1	Method of Documentation2

1Update, accordingly and maintain as confidential medical record

2Acceptable options include:

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

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

This addendum will stay in effect until there are no new COVID-19 cases detected in the exposed group for a 14-day period.

COVID-19 testing

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

- Employees who were not present during the relevant 14-day period.
- $\circ~$ Employees who were fully vaccinated before the multiple infections or outbreak and who do not have symptoms.

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

 COVID-19 testing consists of the following:

 All employees in our exposed group are immediately tested and then again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine, isolation, or exclusion period required by, or orders issued by, the local health department.

 After the first two COVID-19 tests, we continue to provide COVID-19 testing once a week of employees in the exposed group who remain at the workplace, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected

in our workplace for a 14-day period.

• We provide additional testing when deemed necessary by Cal/OSHA.

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

1. Employees in the exposed group wear face coverings when indoors, or when outdoors and less than six feet apart (unless one of the face-covering exceptions indicated in our CPP apply).

2. We give notice to employees in the exposed group of their right to request a respirator for voluntary use if they are not fully vaccinated.

3. We evaluate whether to implement physical distancing of at least six feet between persons, or where six feet of physical distancing is not feasible, the need for use of cleanable solid partitions of sufficient size to reduce COVID-19 transmission.

COVID-19 investigation, review, and hazard correction

We immediately perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19.

The investigation and review is documented and includes:

- Investigation of new or unabated COVID-19 hazards including:
 - $\circ~$ Our leave policies and practices and whether employees are discouraged from remaining home when sick.
 - Our COVID-19 testing policies.
 - Insufficient outdoor air.
 - Insufficient air filtration.
 - Lack of physical distancing.

Updating the review:

- Every thirty days that the outbreak continues.
- In response to new information or to new or previously unrecognized COVID-19 hazards.
- When otherwise necessary.

• Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We consider:

- Moving indoor tasks outdoors or having them performed remotely.
- Increasing outdoor air supply when work is done indoors.
- Improving air filtration.
- Increasing physical distancing as much as feasible.
- Requiring respiratory protection in compliance with section 5144.

Buildings or structures with mechanical ventilation

We will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters, if compatible with the ventilation system. If MERV-13 or higher filters are not compatible, we will use filters with the highest compatible filtering efficiency. We will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units or other air cleaning systems would reduce the risk of transmission and, if so, implement their use to the degree feasible.

Additional Consideration #2

Major COVID-19 Outbreaks

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

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

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

• Provide employees in the exposed group with respirators for voluntary use in compliance with section 5144(c)(2) and determine the need for a respiratory protection program or changes to an existing respiratory protection program under section 5144 to address COVID-19 hazards.

• Separate by six feet (except where we can demonstrate that six feet of separation is not feasible and there is momentary exposure while persons are in movement) any employees in the exposed group who are not wearing respirators required by us and used in compliance with section 5144. When it is not feasible to maintain a distance of at least six feet, individuals are as far apart as feasible.

• Install cleanable solid partitions that effectively reduce transmission between the employee and other persons at workstations where an employee in the exposed group is assigned to work for an extended period, such as cash registers, desks, and production line stations, and where the physical distancing requirement (described above) is not always maintained.

• Evaluate whether to halt some or all operations at the workplace until COVID-19 hazards have been corrected.

• Implement any other control measures deemed necessary by Cal/OSHA.