

Model COVID-19 Prevention Program (CPP)

With some exceptions, all employers and places of employment are required to establish and implement an effective written COVID-19 Prevention Program (CPP) pursuant to 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/

JANUARY 11, 2022

COVID-19 Prevention Program (CPP) for

Nia House Learning Center

This CPP is designed to control employees' exposures to the SARS-CoV-2 virus (COVID-19) that may occur in our workplace.

Date: January 7, 2022

Authority and Responsibility

Eve Uberman and Stacey Wood have 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 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.
- 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.
- 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.

Employee participation

- Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards.
- Employees are kept abreast of workplace prevention controls, screening, and mandated health policies.
- Employees report to their staff representative or administration concerns of Covid-19 hazards and mitigation strategy.

Employee screening

We screen our employees through the following process:

- All employees administer the following [COVID-19 self-screening](#) before coming to work

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:

- Nia House continues to follow Cal/OSHA, City of Berkeley, Alameda Department of Public Health and the California Safe School Plan to ensure that COVID-19 hazards are mitigated and that the organization is up to date and compliant with safety practices and procedures.
- Nia House attends semi-monthly City of Berkeley COVID-19 Learning Sessions and assesses organizational compliance according to updated directives.
- Any necessary corrections will be implemented in a timely manner based on an assessment of the severity of the hazard and available organizational resources.
- School administration are responsible for the timely correction and the school Board of Directors will monitor the administrations corrective implementation.

Control of COVID-19 Hazards

Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees when they are indoors or in vehicles, and where required by orders from the California Department of Public Health (CDPH).

- Nia House signage at the school entrance and at every school door indicates that all who enter (2 years and up) must have a face covering.
- Nia House has clean masks to provide for anyone without or for those that need a replacement.
- The administration and employees are prepared to remind one another and anyone on campus to properly wear their mask and know where to get masks for those without.

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 are required to wear respirators in accordance with our respirator program that meets section 5144 requirements.
- 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.
- 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.

Any employee not wearing a required face covering or allowed non-restrictive alternative, will be at least six feet apart from all other persons unless the unmasked employee is either fully vaccinated or 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

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

- Mask covering
- Less than 15 minutes in proximity

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

- Circulate fresh outdoor air by opening doors and windows.
- Nia House runs [AIRTHEREAL](#) purifiers with HEPA filters in all our classrooms, and additional [COWAY](#) HEPA purifiers and fans. Each classroom has 2 purifiers.
- Reduce time spent indoors by bringing children outside as much as possible.

- NH plans to keep the windows of the classrooms open throughout the year. In the winter months we will heat classrooms as needed and have children wear warmer clothes, as well as put on rain gear to spend time outdoors.
- Nia House will adhere to the guidance put forth by the City of Berkeley- [Wildfire Smoke and COVID-19:Guidance for Schools, Child Care and Youth Programs](#)
- [Nia House's Air Quality Policy](#) during wildfire smoke days and Covid-19.

Cleaning and disinfecting

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

- Inventory of cleaning and disinfecting supplies occurs weekly.
- Staff scheduled for increased routine cleaning and disinfection.
- All employees are informed on best practices and procedures for cleaning and disinfecting, are provided with the supplies, and are given ample time in their work schedule.

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

- Nia House will follow the CDC guidance on cleaning and disinfecting if there is a COVID-19 case in our school.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Children and employees are educated in proper handwashing practices and encouraged to wash for at least 20 seconds each time.
- Facilities allow for access to frequent handwashing for adults and children- all classrooms have access to adult and children's handwashing within their classroom.
- Employees are provided with an effective hand sanitizer, and NH prohibits hand sanitizers that contain methanol (i.e., methyl alcohol).

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 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 to employees with COVID-19 symptoms who are not fully vaccinated, during employees' paid time.

Investigating and Responding to COVID-19 Cases

We have developed effective procedures 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.

We ensure the following:

- Employees that had a close contact are offered COVID-19 testing at no cost during their working hours, excluding:
 - Employees who were fully vaccinated before the close contact and do not have symptoms.
 - COVID-19 cases who were allowed to return to work per our return-to-work criteria and have remained free of symptoms for 90 days after the initial onset of symptoms, or for cases who never developed symptoms, for 90 days after the first positive test.
- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to employees.
- Written notice within 1 day of your 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 at the worksite during the high-risk exposure period. These notifications meet the requirements of T8CCR section 3205(c)(3)(B) and Labor Code section 6409.6(a)(4); (a)(2).

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 and families should report COVID-19 symptoms and possible hazards directly to school administration (phone call to Eve or Stacey) in any instance of concern over symptoms, hazards, or exposure through direct in-person conversation or a phone call to the school during, before and after school hours. Voicemails can and will be checked outside of school hours. Due to the time sensitivity of symptoms and exposure, email cannot be trusted/used for timely communication, please rely upon both a phone call and email.
- Employees and families can report symptoms and hazards without fear of reprisal.
- Nia House will follow procedures and policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Where testing is required, employees can access COVID-19 testing through their health care provider or the City of Berkeley, Curative, Test the People testing sites. Nia House is willing to accommodate testing during work hours with advance planning.
- 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.
- According to [3205.1](#), Nia House will provide access (through Kaiser or City of Berkeley testing sites) to COVID-19 testing to all employees at the 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(s). COVID-19 testing shall be provided at no cost to employees during employees' working hours.
- Nia House's Parent Handbook Addendum offers information about COVID-19 hazards, to, what is being done to control those hazards, and our COVID-19 policies and procedures.
- All school communication alerting to COVID-19 exposure and response procedures are strictly confidential and depend upon protocol and procedures provided by the City of Berkeley and the Alameda Department of Public Health.

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.
 - That face coverings are additionally recommended outdoors for people who are not fully vaccinated if six feet of distance cannot be maintained.
 - 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 offering 12 paid sick days per year to each employee, accrued monthly. During sick leave, all benefits are maintained in full, including but not limited to: health premium payment by the employer, dental premium payment by the employer, regular earnings paid for 12 days of sick time each year, and job protection.

If additional medical leave is needed, Nia House will address individual employees' needs on a case-by-case basis and make the best effort to accommodate unpaid leave with job protection beyond the annual 12 days. Additionally, paid vacation time may also be used to cover the costs of covid-19 isolation orders and illness.

- 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.

Return-to-Work Criteria

Return to work criteria is the same for all community members based on vaccination status (children & employees) and are clearly outlined in the Parent Handbook.

- **COVID-19 cases with symptoms** will not return to work until all the following have occurred:
 - At least 24 hours have passed since a fever of 100.4 °F. or higher has resolved without the use of fever-reducing medications, and
 - COVID-19 symptoms have improved, and
 - At least 10 days have passed since COVID-19 symptoms first appeared, or on day 6 with a negative proctored antigen test on day 5 or after.
- **COVID-19 cases who tested positive but never developed 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, or on/ after day 6 with a negative proctored antigen test on day 5 or after.
- A negative COVID-19 test will not be required for an employee to return to work once the requirements for "cases with symptoms" or "cases who tested positive but never developed symptoms" (above) have been met.
- **Persons who had a close contact may return to work as follows:**
 - These quarantine instructions are for individuals who have had close contact with someone with COVID-19. Please follow separate guidance if you have or develop symptoms of COVID-19, or have tested positive for COVID-19.
 - Cases, or people with COVID-19, can be contagious 48 hours before they have

symptoms, when they have symptoms, or even if they are not showing symptoms.

Having “close contact” with a case is defined as:

- living in the same house;
 - being a caregiver or an intimate partner;
 - being within six feet for a cumulative total of 15 minutes or more over a 24-hour period.
 - Vaccinated employees may continue coming to work while monitoring symptoms for 14 days and testing 3-5 days after exposure.
 - Unvaccinated employees may return on day 8 after to closure with a negative test 3-5 days after exposure
 - All quarantine instructions are subject to change according to local health guidance.
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- If an order to isolate, quarantine, or exclude 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.

Eve Uberman and Stacey Wood

Jan 11, 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: Stacey Wood

Date: October 1, 2021

Name(s) of employee and authorized employee representative that participated: All NH Staff

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
Shared bathrooms, 2 adult bathrooms and 3 children's	Throughout the day	All people on campus- students and employees, some stable groups have their own specific restrooms	Mask wearing, hand washing, washing and disinfecting with each use, HEPA air filters

Children's meal time	Classrooms (Toddlers & PS East) & Outside Eating Areas for PS	Teachers & students assigned to each class/stable group	Outdoor eating and hand washing.
Classrooms	Throughout the day	Teachers & students assigned to each class/stable group	HEPA air filters, open windows and doors, mask wearing

Appendix B: COVID-19 Inspections

Name of person conducting the inspection: Stacey Wood

Work location evaluated: Nia House Learning Center

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions	N/A		
Ventilation (amount of fresh air and filtration maximized)	AIRTHEREAL purifiers with HEPA filters & COWAY HEPA purifiers (2 in each class)		
Additional room air filtration	Circulation of fresh outdoor air		
Administrative			
Physical distancing	Compliant with policy		
Surface cleaning and disinfection (frequently enough and adequate supplies)	Compliant with policy		
Hand washing facilities (adequate numbers and supplies)	Compliant with policy		
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions	Compliant with policy		

PPE (not shared, available and being worn)	Compliant with policy		
Face coverings (cleaned sufficiently often)	Compliant with policy		
Gloves	Compliant with policy		
Face shields/goggles	Available		
Respiratory protection	N/A		

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 a 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 notified:	Names of their authorized representatives:	Date

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]

What could be done to reduce exposure to COVID-19?
[enter information]

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

Date: [enter date]

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

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 need to be added to your CPP if three or more employee COVID-19 cases within an exposed group visited the workplace during their high-risk exposure period at any time during a 14-day period. Reference section [3205.1](#) for details.]

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.
 - 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:
 - 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.
 - **[Describe other applicable controls].**

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.