

# **Coast Community College District** Coast Colleges COVID-19 Prevention Program **Cal/OSHA Compliant**

The COVID-19 Prevention Program (CPP) is designed to control exposures to the SARS-CoV-2 virus ("COVID-19"), that may occur in the workplace

Original Endorsed by DCC and Approved by Chancellor: June 2, 2021

Cal/OSHA Updated Plan: 7/23/2021

# Authority and Responsibility

The Chancellor of the Coast Community College District ("District") has overall authority and responsibility for implementing the provisions of this CPP throughout the District office and each campus (District office, Golden West College campus, Coastline College campuses, and Orange Coast College campuses, individually and collectively referenced in this CPP as the "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

The District will implement the following throughout the Workplace:

- Conduct workplace-specific evaluations with Maintenance & Operations and Campus Safety personnel using the COVID-19 General Checklist and Hazard Analysis forms prior to reopening a facility for use.
- Document the vaccination status of our employees using the COVID-19 Vaccination Status Self-Certification Form.
- 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.
- Ensure training for employees on proper personal safety measures, hygiene, wearing of face covering, distancing, and symptom tracking and case reporting.
- Communicate COVID-19 prevention measures and policies to employees, students, and visitors through direct communications and signage.

#### **Employee Participation**

Employees and their authorized employee representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

- Program ("IIIP). Employees are responsible for reporting any potentially unsafe work conditions to their immediate supervisor, Human Resources, College Safety Committee, or District Risk Services. Pursuant to the District IIIP, all such reports shall be evaluated and appropriately addressed. Employees can report hazards without fear of reprisal.
  - HR to facilitate and document all corrective measures taken in response to "unsafe conditions" reports.
- Reporting positive COVID-19 tests, symptoms, and/or exposures to the Director of Human Resources through email, phone call, or online reporting forms. If on-site, the employee should notify their supervisor of their need to leave the Workplace due to illness until they make contact with Human Resources and are advised of a return-to-the Workplace date.

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

Unsafe or unhealthy work conditions, practices or procedures are documented through Human Resources and corrected in a timely manner based on the severity of the hazards, as follows:

- Periodic inspections conducted using the appropriate <u>Cal/OSHA</u> and <u>Statewide Industry</u> <u>Guidance on COVID-19</u> to identify unhealthy Workplace conditions, work practices, and work procedures related to COVID-19 to ensure compliance.
- Monitoring for compliance of the COVID-19 Prevention Plan will be conducted by campus and District site management.
- Frequent consultation with regulatory agencies (e.g. WHO, CDC, California Department Public Health, Orange County Health Care Agency) related to current infection data, general and industry-specific guidance, and COVID-19 hazards and prevention measures.
- When public health guidance is in conflict, the more restrictive guideline will be followed and enforced.

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

#### **Face Coverings**

Vaccinated employees are not required to wear a mask indoors once they have self-certified via a signed attestation form available through Human Resources that they are fully vaccinated.

We provide clean, undamaged face coverings and ensure they are properly worn by employees that are not fully vaccinated when they are indoors or in vehicles, and where required by orders from the California Department of Public Health (CDPH). Face coverings are defined as a surgical mask, a medical procedure mask, a respirator worn voluntarily, or a tightly woven fabric or non-woven material of at least two layers. A face covering has no visible holes or openings and must cover the nose and mouth. A face covering does not include a scarf, ski mask, balaclava, bandana, turtleneck, collar, or single layer of fabric.

All unvaccinated employees must wear a face covering while indoors at their workplace.

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.
- 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.
- Required to wear respirators in accordance with our respirator program that meets section 5144 requirements.
- 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.
- Performing 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 exempt from 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.

Employees who cannot wear face coverings due to a disability, or who are hearing-impaired or communicating with a hearing-impaired person, must go through the Interactive Process to explore what reasonable accommodations, if any, may be made. Requests for accommodations may be made directly via email to accommodation@cccd.edu.

# **Engineering controls**

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

- Properly maintaining and adjusting all ventilations systems to their manufacturer standards whether we own and operate the building, or not.
- Monitoring and complying with applicable orders and guidance from the State of California and local health departments related to COVID-19 hazards and prevention, including CDPH's Interim Guidance for Ventilation, Filtration, and Air Quality in Indoor Environments.
- Minimizing outdoor air when the EPA Air Quality Index is greater than 100 for any pollutant.
- Providing reasonable accommodations where determined medically necessary.

### Cleaning and disinfecting

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

- Training custodial employees responsible for cleaning in proper protocol for COVID-19 prevention.
- Ensuring adequate supplies and adequate time for routine and proper cleaning of facilities and for employees to wipe down their own work area and equipment.
- Informing employees and authorized employee representatives of the frequency and scope of cleaning and disinfection.
- Establishing specific cleaning protocols as part of department specific re-opening plans.

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

Cleaning and disinfecting services will be performed by a third-party vendor or custodial staff trained and equipped with personal protective supplies and disinfectant materials (Clorox Total 360, Touch Free Microfiber) approved by the Environmental Protective Agency as a Disinfectant for Use Against COVID-19.

#### Hand sanitizing

In order to implement effective hand sanitizing procedures, the following will take place:

- Evaluation of available hand-washing facilities for spacing and number of occupants.
- Encouraging and allowing time for employee hand washing.
- Educating employees on proper hand washing procedures.
- Providing an effective hand sanitizer, that does not contain methanol (i.e. methyl alcohol).
- Posting materials and training describing proper hand washing methods.

#### Personal Protective Equipment (PPE) used to control employees' exposure to COVID-19

- We will provide surgical masks for unvaccinated employees, students, and visitors who do not have their own.
- 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.
- PPE must not be shared, e.g., gloves, goggles and face shields.
- Upon request, we will provide respirators for voluntary use to all employees who are not fully vaccinated and who are working indoors or in vehicles with more than one person.
   Respirators can be requested through employee supervisors or Human Resources.
- 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 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. For employees this will be accomplished through the directors of human resources. For students it will occur through the directors of the student health centers. Both will work in consultation with the Orange County Health Care Agency.

We also ensure the following is implemented:

- 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 <u>and</u> 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.
- Provide employees information on benefits described in Training and Instruction, and Exclusion of COVID-19Cases.
- Written notice within 1 day of our knowledge of a COVID-19 case that people at the worksite
  may have been exposed to COVID-19. This notice will be provided to all employees (and
  their authorized representative), independent contractors and other employers at the
  worksite during the high-risk exposure period. These notifications must meet the
  requirements of T8CCR section 3205(c)(3)(B) and Labor Code section 6409.6(a)(4); (a)(2);
  and (c), and in a form readily understandable by employees and can be anticipated to be
  received by the employee.

# **System for Communicating**

Our goal is to ensure effective two-way communication with our employees, in a format t that can be readily understood, and includes the following information:

- Individual to whom employees should report COVID-19 symptoms, possible close contacts and hazards, and reporting process.
  - You should notify your site human resources director if you have new and unexplained fever or chills, cough, shortness of breath, other breathing difficulties, fatigue, stomach illness, loss of smell or taste, or other feelings of being unwell.
  - You should notify your dean (faculty) or supervisor (staff/management) of your need to leave the workplace immediately due to illness should you have new and unexplained COVID-19 symptoms as described herein
  - Students may choose to notify the Health Center or inform a trusted individual who will notify the Health Center and the President's Office.
  - For employees, the initial point of contact (dean or supervisor) is responsible for notifying human resources. Your point of contact and human resources will reach out to you as needed for follow up.

If you are feeling unwell, we ask that you do not come to campus or visit a District site for any reason for your wellbeing and the wellbeing of others in the workplace. Please report

your absence to your dean or supervisor by phone or email and contact Human Resources immediately for further instructions.

- Employees can report symptoms, possible close contacts and hazards without fear of reprisal.
- The process for how employees with medical or other conditions that put them at increased risk of severe COVID-19 illness can request accommodations is located on the District's Navigator site.
  - The <u>Covid-19 Support and Guidance page</u> on the District's Navigator site will provide options for Employees who may need additional support in relation to Covid-19.
- Access to free COVID-19 testing during the working hours when testing is required.
- Close contacts will be directly notified by Human Resources once exposure has been determined. A close contact is defined as being within 6 feet of a COVID-19 case for a cumulative total of 15 minutes or greater in any 24-hour period during the high-risk exposure period.
- State and federal privacy laws strictly limit the Coast District's ability to share personal health information. Accordingly, the Coast District is not allowed to disclose an employee's health status to colleagues. Any notification will be made in a way that protects the individual's privacy to the extent possible.
- All employees will be notified of positive cases at their site through communications from the President or Chancellor's office or through public online dashboards.

# Training and Instruction

We provide effective employee training and instruction that includes:

- 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:
  - o 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 respiratorswill 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 isworn, 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 handsanitizer 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.
- How to access available mental health benefits and resources.

# **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 through our employer-provided employee sick leave benefits, except where excluded by Section 3205(c)(9(C) for exceptions.
- Providing employees at the time of exclusion with information on available benefits.

# Reporting, Record keeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our Workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as
  defined under CCR Title 8 section 330(h), of an employee occurring in our Workplace or in
  connection with any employment at our Workplace.
- 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 Orange County School Portal for Outbreak Tracking (SPOT) to keep a record of and track all COVID-19 cases. The information will be made available as required by law, with personal identifying information removed.

#### Return-to-Work Criteria

- 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 offever-reducing medications, and
  - o COVID-19 symptoms have improved, and
  - At least 10 days have passed since COVID-19 symptoms first appeared.
- COVID-19 cases who tested positive but never developed 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-19test.
- 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:
  - Close contact but never developed symptoms: when 10 days have passed since the last known close contact.
  - Close contact with symptoms: when the "cases with symptoms" criteria (above) have been met,unless the following are true:
    - The person tested negative for COVID-19 using a polymerase chain reaction (PCR)
       COVID-19 test with specimen taken after the onset of symptoms; and
    - At least 10 days have passed since the last known close contact, and
    - The person has been symptom-free for at least 24 hours, without using fever-reducing medications.
- 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. (Section 3205(c)(10)(E) and (F) for additional guidance).