



COVID-19 PREVENTION PROGRAM

TEMPLATE

NOTE: This document is intended to be used as a guide in preparing your Company's own COVID-19 Prevention Program. It is important that the template be modified with your Company's specific policies and procedures. This document is not intended to provide legal advice specific to your workplace. Please consult with your attorney if you have specific questions related to the applicability of this document and any of its provisions to your workplace.

NOTE: If your Company provides employee housing or employee transportation additional sections must be added to this Program detailing your Company's policies regarding each.

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PURPOSE

In an effort to protect the health and safety of our employees, _____ (Company Name) has prepared a COVID-19 prevention program ("Program") intended to provide information related to the prevention of coronavirus, describe _____ (Company Name) policies, procedures and practices to keep employees safe and to help prevent the spread of coronavirus in the workplace.

This Program is applicable during the current COVID-19 public health emergency. The protocols outlined in this document will be modified based on the ongoing and updated guidance from the Center for Disease Control ("CDC"), state and local public health agencies, and _____ (Company Name) operations.

The Prevention Program is intended to comply with state and local law regarding employees' safety including Labor Code §6400 which requires that every employer must furnish employment and a place of employment that is safe and healthful for the employees therein.

_____ (Name and title) has overall responsibility for handling _____ (Company Name) COVID-19 Prevention Program. In addition, _____ (Company Name) expects all managers and supervisors to implement and maintain the Program in their departments and assigned areas.

SCOPE

This policy applies to all _____ (Company Name) employees and contains general prevention best practices as well as _____ (Company Name) policies and procedures related to COVID-19 in the workplace.

WHAT IS COVID-19

COVID-19 is caused by the coronavirus SARS-CoV-2. COVID-19 is a new disease, caused by a novel (or new) coronavirus that has not previously been seen in humans.

COVID-19 affects people in different ways. Infected people have reported a wide range of symptoms - from mild symptoms to severe illness. Some infected individuals have no symptoms at all. Symptoms may appear 2 to 14 days after exposure to the virus. People with these symptoms may have COVID-19:

- Chills
- Cough

- Shortness of breath or difficulty breathing
- Fatigue
- Muscle or body aches.
- Headache
- Loss of taste or smell
- Sore throat
- Congestion or runny nose
- Nausea or vomiting
- Diarrhea

Laboratory testing is necessary to confirm an infection.

COVID-19 TRANSMISSION

The virus that causes COVID-19 is thought to spread mainly from person to person through respiratory droplets produced when an infected person vocalizes, exhales, coughs or sneezes. These droplets can enter the respiratory tract (mouth, nose, and lungs) of people who are nearby and cause infection. Particles containing the virus can travel more than 6 feet, especially indoors, so physical distancing must be combined with other controls, including wearing face coverings and hand hygiene, to be effective. Spread is more likely when people are in close contact with one another (i.e., within six feet) while not wearing face coverings.

Although it is not considered to be the primary why the virus spreads, transmission may be possible by touching a surface or object that has the virus on it and then touching their own mouth, nose, or eyes.

INFECTION PREVENTION MEASURES – CONTROL OF COVID-19 HAZARDS

_____**(Company Name)**, to the extent possible, will implement the following guidelines and practices to mitigate employee exposure to the coronavirus in the workplace:

1. Where possible encourage and require remote work.
2. Use of video and/or telephonic meetings, and the establishment of guidelines for maintaining a distance of at least six feet between persons, whenever possible.
3. Distribute posters, notices, and/or signage to each work site to be displayed in common areas that provide physical distancing guidelines.
4. Encourage sick employees to stay home.
5. If an employee becomes symptomatic with COVID-19 while at work, they will be asked to leave the workplace and seek medical treatment, depending on the symptoms.

6. _____ (Company Name) will adhere to state guidance and local public health recommendations regarding the prearrangement of office and workplace furniture to maintain physical distancing.
7. To the extent supplies are in stock and readily available for distribution, employees will have access to appropriate hygiene products in the workplace.
8. _____ (Company Name) encourages frequent hand washing with soap for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or handwashing facility. Hand sanitizer doesn't work if the hands are soiled so every effort must be made to wash hands before applying hand sanitizer.
9. Provide and require employees to use face coverings. Face coverings must be worn whenever a _____ (Company Name) employee comes within six feet of another employee. The face covering requirement does not apply to employees who have trouble breathing or who have a medical or mental health condition that prevents the use of a face covering. However, if possible affected employees must wear an alternate form of face covering like a shield.
Note: Face coverings are not considered respiratory or personal protective equipment ("PPE"), but combined with physical distancing, they help prevent infected persons without symptoms or who are pre-symptomatic from knowingly spreading the coronavirus.
10. _____ (Company Name) will maximize, to the extent possible, the quantity of outside air into our buildings and workplaces with mechanical or natural ventilation.
11. _____ (Company Name) will place signs and/or instructions in common areas (for example, reception area, break rooms, public common areas, et cetera) to communicate physical distancing requirements and to provide other COVID-19 infection prevention information to the general public entering the workplace, the work site and buildings.

INVESTIGATION, IDENTIFICATION AND CORRECTION OF COVID-19 HAZARDS

_____ (Company Name) takes seriously its obligation to locate, identify and correct potential COVID-19 hazards in the workplace. The following will be implemented:

1. Evaluate employee workspaces for potential hazards. Employees are encouraged to identify and bring to management's attention potential COVID-19 hazards in their workspace.
2. Conduct periodic inspections of the facility to identify and correct potential hazards that exist in common areas, high traffic areas, and other areas frequented by employees and the public.

3. Evaluate _____ (Company Name) policies and procedures, work practices, and staffing issues to determine whether any of our processes or policies can be changed or amended to reduce or eliminate COVID-19 hazards.
4. _____ (Company Name) will conduct workplace specific evaluations of hazards following any positive COVID-19 case in the workplace.
5. _____ (Company Name) will conduct an investigation to identify and eliminate COVID-19 hazards. In order to protect employees in the workplace it will also investigate each positive COVID-19 case to help identify those employees who were in close contact with the infected employee and require all those potentially exposed to quarantine as required by law.
6. _____ (Company Name) will regularly evaluate the workplace for compliance with this program.
7. Unsafe and unhealthy hazards, work conditions, practices, policies or procedures will be documented and corrected in a timely manner based on the severity of the hazards. Correction priority and correction times will be based on the immediacy of the unsafe or unhealthy hazard.

NOTE: Add your Company's specific policies or procedures for identifying, controlling, and eliminating hazards and minimizing employees working in the facility, if possible.

EMPLOYEE RESPONSIBILITIES

During the COVID-19 public health emergency, _____ (Company Name) employees have a collective responsibility to ensure the protection of all people in the workplace to comply with _____ (Company Name) policies and the latest local public health guidelines to mitigate coronavirus risk to themselves and anyone visiting the work site. Employees have the following affirmative responsibilities:

1. Employees must self-screen for COVID-19 symptoms prior to entering the facility for their shift and should stay home and seek medical treatment if they experienced any of the following symptoms in the past 48 hours:
 - fever or chills
 - cough
 - shortness of breath or difficulty breathing
 - fatigue
 - muscle or body aches
 - headache
 - new loss of taste or smell
 - sore throat

- congestion or runny nose
- nausea or vomiting
- diarrhea

Note: If your company's self screening process is different or you are implementing active screening, enter the company's protocol. NOTE: Employers will need to pay non-exempt employees where self screening is required *before* the start of the shift.

2. Employees must immediately report any symptoms of COVID-19 they experience whether the symptoms developed while at work or elsewhere. Employees must also promptly disclose positive COVID-19 tests.
3. An employee must stay home if they are sick, follow public health agency guidelines, and contact their supervisor or manager for further instructions.
4. Employees who are out ill with fever, cough, shortness of breath, or other acute respiratory symptoms that affect normal breathing who have not been tested for the COVID-19 virus or who have tested negative for the COVID-19 virus, must consult with their physician and their manager before physically returning to work.
5. Employees must cooperate with _____ (Company Name) in any investigation related to the onset of illness, date of symptoms, others with whom the employee had close contact, and coronavirus testing among other topics. The investigation will help _____ (Company Name) to identify employees who may have been exposed and quarantine them so there is no further workplace exposure.
6. Employees who test positive for the COVID-19 virus must not return to work until the following occurs:

When Symptomatic

- At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever and reducing medications;
- COVID-19 symptoms have improved;
- At least 10 days have passed since COVID-19 symptoms first appeared.

When Asymptomatic

Employees who test positive but never developed COVID-19 symptoms shall 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.

7. Employees who return to work following an illness must promptly report any recurrence of symptoms to their immediate supervisor.

8. Employees shall practice physical distancing and remain at least 6 feet apart when practicable. When it isn't practicable employees must wear face coverings. Ways to maintain physical distancing include working from home when practicable, and by using video or telephonic meetings as much as possible.
9. Employees must avoid shared workspaces (desks, offices, and cubicles) and work items (phones, computers, other work tools, and equipment) whenever possible. If employees must share workspaces, clean and disinfect shared workspaces and work items before and after use.
10. Employees shall wash hands with soap and water for at least 20 seconds and/or use hand sanitizer after interacting with people and after contacting shared surfaces or objects.
11. Employees shall cover coughs and sneezes and avoid touching eyes, nose, and mouth with unwashed hands.
12. Employees must avoid sharing personal items with co-workers (for example, dishes, cups, utensils, towels).
13. Employees shall notify their manager or supervisor if any washing facilities do not have an adequate supply of suitable cleaning agents, water, single-use towels, or blowers.
14. No employees shall bring cleaning products and/or disinfectant into the workplace that had not been approved by _____ (Company Name).

PERSONAL PROTECTIVE EQUIPMENT

While engineering and administrative controls are considered more effective in minimizing exposure to COVID-19, personal protective equipment (PPE) may also be needed to prevent certain exposures. While correctly using PPE can help prevent some exposures, it should not take the place of other prevention strategies. Examples of PPE include gloves, goggles, face shields, face masks, and respiratory protection, when appropriate. During the outbreak of infectious diseases, such as COVID-19, recommendations for PPE specific to occupations or job tasks may change depending on the updated risk assessments for workers, and information on PPE effectiveness in preventing the spread of COVID-19.

_____ (Company Name) will supply all necessary and required PPE, including face coverings.

_____ (Company Name) will clean any soiled PPE and replaced any damaged PPE. If employees wish to use additional PPE, they must make the request of the manager or supervisor who will approve usage. Managers and supervisors will approve all reasonable requests.

CLEANING AND DISINFECTION POLICY AND PRACTICE

The _____ (Company Name) recognizes that high traffic and high touch common areas in the workplace need to the extent possible cleaning and disinfecting to limit the spread of the COVID-19 virus.

_____ (Company Name) will assign personnel and establish routine schedules to clean and disinfect common areas and objects in the workplace. This includes, but is not limited to, copy machines, containers, counters, tables, desks, chairs, benches, door handles, knobs, drinking fountains, refrigerators, vending machines, rest room and bathroom surfaces, elevator buttons, and trash cans.

The process of disinfecting includes providing disinfecting products that are EPA approved for use against the virus that causes COVID-19 and following the manufacturer's instructions for all cleaning and disinfection products (for example, safety requirements, PPE, concentration, contact time).

NOTE: Employers should reference or include their specific cleaning and disinfection policies and plans here.

RESPONDING TO CONFIRMED OR SUSPECTED COVID-19 CASES

When required _____ (Company Name) will consult with state and local public health agencies for mitigation practices and responsible protocols. _____ (Company Name) will follow the California Health Department strategies, listed below, for returning employees to work. The following are considered minimum criteria for return to work and some variation may occur depending on individual cases, our local public health department and unique circumstances. Negative COVID-19 tests are not required in order to return to work.

Symptomatic Positive: Employees with symptoms who are laboratory confirmed to have COVID-19.

1. At least 24 hours have passed since resolution of fever without use of fever reducing medications; and
2. At least 10 days have passed since symptom onset; and
3. Other symptoms have improved.

Asymptomatic Positive: Employees who have never had symptoms and are laboratory confirmed to have COVID-19. A minimum of 10 days have passed since the date of their first positive COVID-19 tests. If symptoms develop then the criteria for Symptomatic Positive cases will apply.

Symptomatic Negative: Employees who had symptoms of COVID-19 but test results returned negative. Use the same criteria as Symptomatic Positive cases.

Asymptomatic Negative: Employees who never had symptoms but were tested due to a close contact with a laboratory confirmed case patient and were negative. Employees should quarantine at home for 14 days after the last known contact with the case-patient. Symptoms can

develop even after testing negative within 14 days of exposure. The local health department and Cal/OSHA may consider allowing an earlier return to work only if an employee in a critical infrastructure industry in which the essential operations of the workplace would be compromised by quarantine of the employee and no alternate staff can perform the role. It must be shown that the removal of the employee would create an undue risk to a community's health and safety.

Symptomatic Untested: Employees who had symptoms of COVID-19 but were not tested. Testing is encouraged, If an employee cannot be tested or refuses to be tested, use the same criteria for return to work as Symptomatic Positive cases.

Asymptomatic Untested: Employees who had close contact to a laboratory confirmed case at work, home, or in the community and do not have symptoms **or** employees who refuse or are unable to be tested after close contact with a laboratory-confirmed case, despite recommendation for testing from local health department or healthcare provider, and do not have symptoms. Employees should be quarantined at home for 14 days after the last known contact with the case-patient. Testing is highly recommended; if testing hasn't occurred the local health department and Cal/OSHA may consider allowing an earlier return to work only if an employee in a critical infrastructure industry in which the essential operations of the workplace would be compromised by quarantine of the employee and no alternate staff can perform the role. It must be shown that the removal of the employee would create an undue risk to a community's health and safety. If symptoms develop then the criteria for Symptomatic Positive cases will apply.

If an employee tests positive for COVID-19, _____ (Company Name) will immediately inform co-workers of their possible exposure to COVID-19 in the workplace but maintain confidentiality as required by the Americans with Disabilities Act (ADA) and the Fair Employment and Housing Act (FEHA). _____ (Company Name) will also investigate any confirmed COVID-19 illness to determine and mitigate any work-related factors that may have contributed to the risk of infection.

_____ (Company Name) will provide no cost testing during work hours to all employees who must be quarantined and excluded from the workplace as required by law.

Cleaning and Disinfecting Following a Confirmed COVID-19 Case.

1. Temporarily close the general area where the infected employee or guest worked/visited until cleaning has completed.
2. If possible, open outside doors and windows and use ventilating fans to increase air circulation in the area. Wait 24 hours or as long as practical before cleaning and disinfecting the area.
3. Conduct deep cleaning of the entire general area where the infected employees worked and may have been, including break rooms, restrooms and travel areas with a cleaning agent approved for use by the EPA against the coronavirus.

4. Custodial personnel cleaning the area must be equipped with a proper personal protective equipment for COVID-19 disinfection (disposable gown, gloves, eye protection, or mask, if required).

SYSTEM FOR COMMUNICATION

Communication between employees and _____ (Company Name) on matters relating to COVID-19 mitigation and response is important to ensure employees' safety while in the workplace. Therefore, _____ (Company Name) has a communication system that is intended to accomplish clear and concise exchange of information by providing a single point of contact for managers and supervisors. Employees are encouraged to freely communicate with their supervisors and managers with regard to coronavirus symptoms, possible exposures, workplace concerns, and suggestions for correction of potential hazards without fear of reprisal.

1. All _____ (Company Name) employees are encouraged to report to their immediate manager or supervisor concerns regarding COVID-19 mitigation practices or possible COVID-19 exposure in the workplace.
2. Managers and supervisors who, after assessing the concern, determine that additional guidance or assistance is required shall contact _____ (Employee Title and Contact Information) who will triage the report and notify essential personnel for an appropriate response.
3. If an employee has a disability, medical or other condition that put them at increased risk of severe COVID-19 illness and an accommodation is needed they are encouraged to report it to their supervisor or manager. _____ (Company Name) will evaluate the request and determine, with input from the employee and their health care provider, whether the employee can be accommodated.
4. When required by law, _____ (Company Name) will provide COVID-19 testing to potentially exposed employees.

NOTE: Add employer specific information about communication plans and testing procedures including who in the company is responsible for communication related to COVID-19.

MULTIPLE COVID-19 INFECTIONS AND COVID-19 OUTBREAKS

_____ (Company Name) will adhere to the following policies and practices should the workplace experience a COVID-19 outbreak or major outbreak.

A COVID-19 outbreak is defined as 3 or more cases of COVID-19 in a 14 day period.

A major COVID-19 outbreak is defined as 20 or more cases of COVID-19 in a 30 day period.

1. _____ (Company Name) will provide the legally mandated COVID-19 testing to all exposed employees in the workplace except those who were not present during the period of an outbreak. The testing will be provided at no cost to the employees and will occur during working hours.
2. All employees will be tested as frequently as required for a COVID-19 outbreak or a major COVID-19 outbreak. Additional testing will be provided when deemed necessary by Cal/OSHA.
3. We will quarantine and exclude all COVID-19 cases and those exposed to the COVID-19 cases as set forth above in **Responding to Positive or Suspected COVID-19 Cases in the Workplace.**
4. _____ (Company Name) will immediately investigate and determine possible COVID-19 hazards that may have contributed to the outbreak in accordance with **Investigation, Identification, and Correction of COVID-19 Hazards and Responding to Positive or Suspected COVID-19 Cases in the Workplace.**
5. _____ (Company Name) will perform a review of its COVID-19 policies, procedures, and controls and implement changes where needed. The investigation and review will be documented and include review of:
 - a. Leave policies and practices to insure employees are encouraged to remain home when sick;
 - b. COVID-19 testing process;
 - c. Insufficient outdoor air;
 - d. Lack of physical distancing, face coverings or use of other PPE.
 - e. Evaluation of mechanical ventilation, and, if possible, filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the system. We will evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other cleaning systems would reduce the risk of transmission.
 - f. Determine the need for additional respiratory protection.
 - g. Determine whether to halt some or all operations until the COVID-19 hazard has been corrected.
 - h. Implement any other control measures as required by Cal/OSHA.

6. Notify the local health department as required by law.

POTENTIAL BENEFITS AVAILABLE TO EMPLOYEES WHO MUST QUARANTINE

Employees may be entitled to the following COVID-19 benefits under applicable federal, state, or local laws, including, but not limited to, COVID-19 related leave, company sick leave, state-mandated leave, supplemental sick leave, negotiated leave provisions and workers compensation:

NOTE: This section is very employer specific. Be sure to carefully input your Company's specific policies.

Families First Coronavirus Response Act Leave [or AB 1837 Leave if the business employs more than 500 employees];

Family Medical Leave Act/California Family Rights Act Leave. [if applicable]

Local Sick Leave [or] Local Supplemental Sick Leave. [if applicable]

(Company Name) California Sick Leave Policy [or PTO Policy if the PTO policy encompasses California sick leave requirements].

(Company Name) PTO Policy or Vacation Policy [Only include the PTO policy if the company's PTO policy does **not** include California sick leave requirements. Use the vacation policy if company policy or practice allows for the use of vacation time off for sick leave purposes].

Leave Pursuant to the Collective Bargaining Agreement. [if applicable].

Workers' Compensation Benefits. If you believe you contracted a COVID-19-related illness as a result of your employment, you may be entitled to workers' compensation benefits. If it is determined the COVID-19-related illness arose out of and in the course of employment, you may be entitled to compensation including full hospital, surgical, and medical treatment, disability indemnity, and death benefits. To file a workers' compensation claim, please notify your employer that you believe your COVID-19-related illness is work-related and file a DWC 1 Claim Form pursuant to Labor Code Section 5401.

Earnings Continuation. If the COVID-19 exposure is work related, the employee is required to quarantine, is able to work, and work from home or temporary work is unavailable, the employee may be entitled to earnings and benefit continuation.

NOTE: Include any additional Company benefit that the employee may be entitled to receive.

REPORTING, RECORDKEEPING, AND ACCESS

(Company Name) is committed to following all local and state law requiring reporting, recordkeeping, and access to records. It is our policy to:

1. Record and track all COVID-19 cases, including the date of a positive test, as required by law. The record will be made available to employees, authorized employee representatives, or as otherwise required by law. All identifying information will be removed prior to providing access.
2. Report information about COVID-19 cases to the local health department when required by law and to provide the local health department all requested information.
3. Immediately report to Cal/OSHA any COVID-19 related serious illness or death, as defined by law, occurring in the workplace.
4. Keep and maintain records of _____ (Company Name) efforts to implement the written COVID-19 Prevention Program.
5. Make the COVID-19 Prevention Program available to employees, authorized employee representatives, and to Cal/OSHA immediately upon request.

NOTE: Include any additional measures the Company will take.

EMPLOYEE TRAINING

_____ (Company Name) will provide training in the general description of COVID-19, symptoms, when to seek medical attention, how to prevent the spread, and the employer's procedures for preventing its spread at the workplace. The training may consist of reviewing written documentation, in-person presentation, online video training and/or acknowledgment of receipt of the _____ (Company Name) COVID-19 prevention program.

Employees will be notified of the training and all employees are required to participate.