



County Of Imperial COVID-19 Prevention Program (CPP)

Finalized December 15, 2020

I. PURPOSE:

The purpose of the **County of Imperial's** COVID-19 Prevention Program ("CPP") is to provide employees a healthy and safe workplace as required under the California Occupational Safety and Health Act (Labor Code §§ 6300, *et seq.*) and associated regulations (8 C.C.R. § 3205).

Nothing in this CPP precludes the **County of Imperial** from complying with federal, state, or local laws or guidance that recommends or requires measures that are more prescriptive and/or restrictive than are provided herein.

II. SCOPE

This CPP applies to all **County of Imperial** employees except for **County of Imperial** employees who are telecommuting.

III. DEFINITIONS:

For the purposes of the CPP, the following definitions shall apply:

"COVID-19" means coronavirus disease, an infectious disease caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).

"COVID-19 case" means a person who either: (1) Has a positive "COVID-19 test" as defined in this section; (2) Is subject to COVID-19-related order to isolate issued by a local or state health official; or (3) Has died due to COVID-19, in the determination of a local health department or per inclusion in the COVID-19 statistics of a county. A person is no longer a "COVID-19 case" when a licensed health care professional determines that the person does not have COVID-19, in accordance with recommendations made by the California Department of Public Health (CDPH) or the local health department pursuant to authority granted under the Health and Safety Code or title 17, California Code of Regulations to CDPH or the local health department.

"Close contact COVID-19 exposure" means being within six (6) feet of a COVID-19 case for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the "high-risk exposure period" as defined here. This definition applies regardless of the use of face coverings.

"COVID-19 hazard" means exposure to potentially infectious material that may contain SARS-CoV-2, the virus that causes COVID-19. Potentially infectious materials include airborne droplets, small particle aerosols, and airborne droplet nuclei, which most commonly result from a person or persons exhaling, talking or vocalizing, coughing, sneezing, or procedures performed on persons which may aerosolize saliva or respiratory tract fluids, among other things. This also includes objects or surfaces that may be contaminated with SARS-CoV-2.

"COVID-19 symptoms" means one of the following: (1) fever of 100.4 degrees Fahrenheit or higher or chills; (2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches; (6) headache; (7) new loss of taste or smell; (8) sore throat; (9) congestion or runny nose; (10) nausea or vomiting; or (11) diarrhea, unless a licensed

health care professional determines the person's symptoms were caused by a known condition other than COVID-19.

"COVID-19 test" means a viral test for SARS-CoV-2 that is both: (1) Approved by the United States Food and Drug Administration (FDA) or has an Emergency Use Authorization from the FDA to diagnose current infection with the SARS-CoV-2 virus; and (2) Administered in accordance with the FDA approval or the FDA Emergency Use Authorization as applicable.

"Exposed workplace" means any work location, working area, or common area at work used or accessed by a COVID-19 case during the high-risk period, including bathrooms, walkways, hallways, aisles, break or eating areas, and waiting areas.

The exposed workplace does not include buildings or facilities not entered by a COVID-19 case. Effective January 1, 2021, the "exposed workplace" also includes but is not limited to the "worksites" of the COVID-19 case as defined by Labor Code section 6409.6(d)(5).

"Face covering" means a tightly woven fabric or non-woven material with no visible holes or openings, which covers the nose and mouth.

"High-risk exposure period" means the following time period: (1) For persons who develop COVID-19 symptoms: from two (2) days before they first develop symptoms until ten (10) days after symptoms first appeared, and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved; or (2) For persons who test positive who never develop COVID-19 symptoms: from two (2) days before until ten (10) days after the specimen for their first positive test for COVID-19 was collected.

IV. PROGRAM

A. System for Communicating with County of Imperial employees

1. Reporting COVID-19 Symptoms, Possible COVID-19 Close Contact Exposures, and Possible COVID-19 Hazards at County of Imperial Worksites and Facilities

County of Imperial policy requires that **County of Imperial** employees immediately report to their manager or supervisor or Human Resources any of the following: (1) the employee's presentation of COVID-19 symptoms; (2) the employee's possible COVID-19 close contact exposures; (3) possible COVID-19 hazards at **County of Imperial** worksites or facilities.

The **County of Imperial** will not discriminate or retaliate against any **County of Imperial** employee who makes such a report.

2. Accommodations Process for County of Imperial Employees with Medical or Other Conditions that put them at Increased Risk of Severe COVID-19 Illness

County of Imperial policy provides for an accommodation process for employees who have a medical or other condition identified by the Centers for Disease Control and Prevention (“CDC”) or the employees’ health care provider as placing or potentially placing the employees at increased risk of severe COVID-19 illness.

The CDC identifies the following medical conditions and other conditions as placing or potentially placing individuals at an increased risk of severe COVID-19 illness

The CDC guidance provides that adults of any age with the following conditions are at increased risk of severe illness from the virus that causes COVID-19:

- Cancer
- Chronic kidney disease
- COPD (chronic obstructive pulmonary disease)
- Heart conditions, such as heart failure, coronary artery disease, or cardiomyopathies
- Immunocompromised state (weakened immune system) from solid organ transplant
- Obesity (body mass index [BMI] of 30 kg/m² or higher but < 40 kg/m²)
- Severe Obesity (BMI ≥ 40 kg/m²)
- Pregnancy
- Sickle cell disease
- Smoking
- Type 2 diabetes mellitus

The CDC guidance also provides that adults of any age with the following conditions might be at an increased risk for severe illness from the virus that causes COVID-19:

- Asthma (moderate-to-severe)
- Cerebrovascular disease (affects blood vessels and blood supply to the brain)
- Cystic fibrosis
- Hypertension or high blood pressure
- Immunocompromised state (weakened immune system) from blood or bone marrow transplant, immune deficiencies, HIV, use of corticosteroids, or use of other immune weakening medicines
- Neurologic conditions, such as dementia
- Liver disease
- Overweight (BMI > 25 kg/m², but < 30 kg/m²)
- Pulmonary fibrosis (having damaged or scarred lung tissues)
- Thalassemia (a type of blood disorder)
- Type 1 diabetes mellitus

The **County of Imperial** will periodically review the following web address in order to account for any additional medical conditions and other conditions that the CDC has identified as placing or potentially placing individuals at an increased risk of severe

COVID-19: <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html>

County of Imperial employees are encouraged to review the list of medical conditions and other condition provided above in order to determine whether they have such a condition.

To request an accommodation under the **County of Imperial** policy, employees may make a request with their manager or supervisor or Human Resources. An accommodation request form is available online.

3. COVID-19 Testing

The **County of Imperial** possesses authority to require that employees who report to work at **County of Imperial** worksites or facilities be tested for COVID-19.

Where the **County of Imperial** requires that **County of Imperial** employees be tested, the **County of Imperial** will inform employees for the reason that testing is required.

The **County of Imperial** will also inform **County of Imperial** employees of the possible consequences of a positive COVID-19 test, which may include, but is not limited to, a requirement that employees not report to **County of Imperial** during the high-risk exposure period and satisfying the minimum criteria to return to work.

Where the **County of Imperial** requires testing, the **County of Imperial** has adopted policies and procedures that ensure the confidentiality of employees and comply with the Confidentiality of Medical Information Act ("CMIA"). Specifically, the **County of Imperial** will keep confidential all personal identifying information of COVID-19 cases or persons with COVID-19 symptoms unless expressly authorized by the employee to disclose such information or as other permitted or required under the law.

4. COVID-19 Hazards

The **County of Imperial** will notify **County of Imperial** employees and subcontracted employees of any potential COVID-19 exposure at a **County of Imperial** worksite or facility where a COVID-19 case and **County of Imperial** employees were present on the same day. The **County of Imperial** will notify **County of Imperial** employees of such potential exposures within one (1) business day, in a way that does not reveal any personal identifying information of the COVID-19 case.

The **County of Imperial** will also notify **County of Imperial** employees of cleaning and disinfecting measures the **County of Imperial** is undertaking in order to ensure the health and safety of the **County of Imperial** worksite or facility where the potential exposure occurred.

B. Identification and evaluation of covid-19 hazards at County of Imperial worksites and facilities

1. Screening County of Imperial Employees for COVID-19 Symptoms

The County of Imperial possesses authority to screen employees for COVID-19 symptoms. Therefore, it is the County Imperial's policy to screen County of Imperial employees for COVID-19 symptoms prior to entering County of Imperial worksites and facilities.

2. Responding to County of Imperial Employees with COVID-19 Symptoms

Should a **County of Imperial** employee present COVID-19 symptoms during a **County of Imperial administered screening**, the **County of Imperial** will instruct the employee to remain at or return to their home or place of residence and not report to work until such time as the employee satisfies the minimum criteria to return to work.

The **County of Imperial** will advise employees of any leaves to which they may be entitled during this self-quarantine period.

Further, the **County of Imperial** has adopted policies and procedures that ensure the confidentiality of employees and comply with the CMIA, and will not disclose to other employees the fact that the employees presented COVID-19 symptoms.

3. County of Imperial's Response to COVID-19 Cases

In the event that **County of Imperial** employees test positive for COVID-19 or are diagnosed with COVID-19 by a health care provider, the **County of Imperial** will instruct the employees to remain at or return to their home or place of residence and not report to work until such time as they satisfy the minimum criteria to return to work.

The **County of Imperial** will advise employees of any leaves to which they may be entitled during this self-isolation period.

The **County of Imperial** will comply with all reporting and recording obligations as required under the law, including, but not limited to, reporting the COVID-19 case to the following individuals and institutions as required based on the individual circumstances: (1) the local health department; (2) Cal/OSHA; (3) employees who were present at a **County of Imperial** worksite or facility when the COVID-19 case was present; (4) the employee organizations that represent employees at the **County of Imperial** worksite or facility; (4) the employers of subcontracted employees who were present at the **County of Imperial** worksite or facility; and (5) the **County of Imperial's** workers' compensation plan administrator.

The **County of Imperial** will interview the COVID-19 cases in order to ascertain the nature and circumstances of any contact that the employees may have had with other employees during the high-risk exposure period. If the **County of Imperial** determines that there were any close contact COVID-19 exposures, the **County of Imperial** will instruct those employees to remain off the worksite and telecommute (if possible) until such time as the employees satisfy the minimum criteria to return to work. Exceptions to this rule include employees deemed to be essential and exempt from the self-quarantine orders provided by Public Health.

The **County of Imperial** has adopted policies and procedures that ensure the confidentiality of employees and comply with the CMIA. Specifically, the **County of Imperial** will not disclose to other employees, except for those who need to know, the fact that the employees tested positive for or were diagnosed with COVID-19. Further, the **County of Imperial** will keep confidential all personal identifying information of COVID-19 cases or persons unless expressly authorized by the employees to disclose such information or as other permitted or required under the law.

4. Workplace-Specific Identification of COVID-19 Hazards

The **County of Imperial** conducted a workplace-specific assessment of all interactions, areas, activities, processes, equipment, and materials that could potentially expose employees to COVID-19 hazards.

As part of this process, the **County of Imperial** identified places and times when employees and individuals congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not, including, for example, during meetings or trainings, in and around entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

As part of this process, the **County of Imperial** identified potential workplace exposure to all persons at **County of Imperial** worksites and facilities, including employees, employees of other entities, members of the public, customers or clients, and independent contractors. The **County of Imperial** considered how employees and other persons enter, leave, and travel through **County of Imperial** worksites and facilities, in addition to addressing employees' fixed workspaces or workstations.

As part of this process, the **County of Imperial** treated all persons, regardless of symptoms or negative COVID-19 test results, as potentially infectious.

5. Maximization of Outdoor Air and Air Filtration

For indoor **County of Imperial** worksites and facilities, the **County of Imperial** evaluated how to maximize the quantity of outdoor air and whether it is possible to increase filtration efficiency to the highest level compatible with the worksites and facilities' existing ventilation systems.

6. County of Imperial Compliance with Applicable State and Local Health Orders

The **County of Imperial** monitors applicable orders and guidance from the State of California and the local health department related to COVID-19 hazards and prevention, including information of general application and information specific to the **County of Imperial's** location and operations.

The **County of Imperial** fully and faithfully complies with all applicable orders and guidance from the State of California and the local health department.

7. Evaluation of Existing COVID-19 Prevention Controls and Adoption of Additional Controls

Periodically, the **County of Imperial** will evaluate existing COVID-19 prevention controls at the workplace and assess whether there is a need for different and/or additional controls.

This includes evaluation of controls related to the correction of COVID-19 hazards, physical distancing, face coverings, engineering controls, administrative controls, and personal protective equipment (PPE).

8. Periodic Inspections

The **County of Imperial** will conduct periodic inspections of **County of Imperial** worksites and facilities as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with the **County of Imperial's** COVID-19 policies and procedures.

C. INVESTIGATING AND RESPONDING TO COVID-19 CASES IN COUNTY OF IMPERIAL WORKSITES AND FACILITIES

1. Procedure to Investigate COVID-19 Cases

The **County of Imperial** has a procedure for investigating COVID-19 cases in the workplace. As provided below, the procedure provides for the following: (1) the verification of COVID-19 case status; (2) receiving information regarding COVID-19 test results; (3) receiving information regarding the presentation of COVID-19 symptoms; and (4) identifying and recording all COVID-19 cases.

2. Response to COVID-19 Cases

As provided above at Section IV.B.3., in the event that **County of Imperial** employees test positive for COVID-19 or are diagnosed with COVID-19 by a health care provider, the **County of Imperial** will instruct the employees to remain at or return to their home or place of residence and not report to work until such time as the employees satisfy the minimum criteria to return to work.

a. Contact Tracing

The **County of Imperial (through Public Health)** will interview the COVID-19 cases in order to ascertain the following information: (1) the date on which the employees tested positive, if asymptomatic, or the date on which the employees first presented COVID-19 symptoms, if symptomatic; (2) the COVID-19 cases recent work history, including the day and time they were last present at an **County of Imperial** worksite or facility; and (3) the nature and circumstances of the COVID-19 cases' contact with other employees during the high-risk exposure period, including whether there were any close contact COVID-19 exposure.

If the **County of Imperial** determines that there were any close contact COVID-19 exposures, the **County of Imperial** will instruct those employees to remain at their home or place of residence and telecommute (if possible) until such time as the employees satisfy the minimum criteria to return to work.

b. Reporting the Potential Exposure to Other Employees

The **County of Imperial** will comply with all reporting and recording obligations as required under the law, including, but not limited to, reporting the COVID-19 case to the following individuals and institutions as required based on the individual circumstances: (1) employees who were present at a **County of Imperial** worksite or facility when the COVID-19 case was present; and (2) subcontracted employees who were present at the **County of Imperial** worksite or facility.

c. Free COVID-19 Testing for Close Contact Exposures

The **County of Imperial** will provide COVID-19 testing at no cost to employees during their working hours to all employees who had potential close contact COVID-19 exposure at a **County of Imperial** worksite or facility.

d. Leave and Compensation Benefits for Close Contact Exposures

The **County of Imperial** will provide these employees with information regarding COVID-19-related benefits to which the employees may be entitled under applicable federal, state, or local laws. This includes any benefits available under workers' compensation law, the federal Families First Coronavirus Response Act (FFCRA), Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, local governmental requirements, the **County of Imperial's** own leave policies, and leave guaranteed by contract.

The **County of Imperial** will continue to provide and will maintain these employees' rights and benefits, including the employees' right to their former job status, as if the employees had not been removed from their jobs.

The **County of Imperial** may require that these employees use employer-provided employee sick leave benefits for this purpose where permitted by law and when not covered by workers' compensation.

e. Investigation to Determine Whether Workplace Conditions Contributed to COVID-19 Exposure

The **County of Imperial** will conduct an investigation in order to determine whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure to COVID-19 hazards.

3. Confidential Medical Information

The **County of Imperial** will protect the confidentiality of the COVID-19 cases, and will not disclose to other employees the fact that the employees tested positive for or were diagnosed with COVID-19.

The **County of Imperial** will keep confidential all personal identifying information of COVID-19 cases unless expressly authorized by the employees to disclose such information or as other permitted or required under the law.

D. CORRECTION OF COVID-19 HAZARDS AT COUNTY OF IMPERIAL WORKSITES AND FACILITIES

The **County of Imperial** will implement effective policies and/or procedures for correcting unsafe or unhealthy conditions, work practices, policies and procedures in a timely manner based on the severity of the hazard.

This includes, but is not limited to, implementing controls and/or policies and procedures in response to the evaluations conducted related to the identification and evaluation of COVID-19 hazards and investigating and responding to COVID-19 cases in the workplace. This also includes implementing controls related to physical distancing, face coverings, engineering controls, administrative controls, and personal protective equipment (PPE).

E. TRAINING AND INSTRUCTION OF COUNTY OF IMPERIAL EMPLOYEES

1. COVID-19 Symptoms

The **County of Imperial** provided employees training and instruction on the COVID-19 symptoms, including advising employees of COVID-19 symptoms, which include the following: (1) fever of 100.4 degrees Fahrenheit or higher or chills; (2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches; (6) headache; (7) new loss of taste or smell; (8) sore throat; (9) congestion or runny nose; (10) nausea or vomiting; or (11) diarrhea, unless a licensed health care professional determines the person's symptoms were caused by a known condition other than COVID-19.

The **County of Imperial** monitors and adheres to guidance by the CDC concerning COVID-19 symptoms, including guidance provided at the following web address:

<https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>

The **County of Imperial** will advise employees in the event that the CDC makes any changes to its guidance concerning such symptoms.

The **County of Imperial** provided employees instruction on the importance of not coming to work and obtaining a COVID-19 test if the employees have COVID-19 symptoms.

2. County of Imperial's COVID-19 Policies and Procedures

The **County of Imperial** provides regular updates to employees on the **County of Imperial's** policies and procedures to prevent COVID-19 hazards at **County of Imperial** worksites and facilities and to protect **County of Imperial** employees.

3. COVID-19 Related Benefits

The **County of Imperial** advised **County of Imperial** employees of the leaves to which the employees may be entitled under applicable federal, state, or local laws. This includes any benefits available under workers' compensation law, the FFCRA, Labor Code

sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, the **County of Imperial**'s own leave policies, and leave guaranteed by contract.

Further, when employees require leave or are directed not to report to work by the **County of Imperial**, the **County of Imperial** will advise the employees of the leaves to which the employees may be entitled for that specific reason.

4. **Spread and Transmission of the Virus that Causes COVID-19**

The **County of Imperial** advised **County of Imperial** employees of the that COVID-19 is an infectious disease that can be spread through the air when an infectious person talks or vocalizes, sneezes, coughs, or exhales; that COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth, although that is less common; and that an infectious person may have no symptoms.

The **County of Imperial** further advised **County of Imperial** employees of the fact that particles containing the virus can travel more than six (6) feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, including hand washing, in order to be effective.

5. **Methods and Importance of Physical Distancing, Face Coverings, and Hand Hygiene**

The **County of Imperial** advised **County of Imperial** employees of the methods and importance of physical distancing, face coverings, and hand hygiene, including hand washing.

Specifically, the **County of Imperial** trained and instructed **County of Imperial** employees on 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.

Further, the **County of Imperial** trained and instructed **County of Imperial** on the proper use of face coverings and the fact that face coverings are not respiratory protective equipment.

F. **PHYSICAL DISTANCING**

The **County of Imperial** requires that all **County of Imperial** employees be separated from other persons by at least six (6) feet, except where the **County of Imperial** can demonstrate that six (6) feet of separation is not possible and where there is momentary exposure while persons are in movement.

The **County of Imperial** has adopted several methods by which it increases physical distancing including, but not limited to, the following: (1) providing **County of Imperial** employees the opportunity to telework or engage in other remote work arrangements; (2) reducing the number of persons in an area at one time, including visitors; (3) posting visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel; (4) adopting staggered arrival,

departure, work, and break times; and (5) adjusting work processes or procedures, such as reducing production speed, to allow greater distance between employees.

When it is not possible for **County of Imperial** employees to maintain a distance of at least six (6) feet, the **County of Imperial** requires individuals to be as far apart as possible.

G. FACE COVERINGS

1. Face Covering Requirement

The **County of Imperial** provides face coverings to **County of Imperial** employees and requires that such face coverings are worn by employees and individuals at **County of Imperial** worksites and facilities.

County of Imperial policy adheres to orders and guidance provided by the CDPH and the local health department, including as provided at the following web address:

<https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/guidance-for-face-coverings.aspx>

The **County of Imperial's** policy on the use of face coverings ensures that they are worn over the nose and mouth when indoors, when outdoors and less than six (6) feet away from another person, and where required by orders from the CDPH or local health department.

The **County of Imperial's** policy requires that face coverings are clean and undamaged. The **County of Imperial's** policy allows for face shields to be used to supplement, and not supplant face coverings.

The **County of Imperial's** policy provides for the following exceptions to the face coverings requirement:

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least six (6) feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
- Employees wearing respiratory protection in accordance with section 5144 or other title 8 safety orders (8 C.C.R. 5144 is available at the following web address: <https://www.dir.ca.gov/title8/5144.html>).
- 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.
- Specific tasks which cannot feasibly be performed with a face covering. This exception is limited to the time period in which such tasks are actually being performed, and the unmasked employee shall be at least six (6) feet away from all other persons unless unmasked employees are tested at least twice weekly for COVID-19.

2. Required Use of Effective Non-Restrictive Alternative for Employees Exempted from Face Covering Requirement

The **County of Imperial**'s policy requires that **County of Imperial** employees who exempted from wearing face coverings due to a medical condition, mental health condition, or disability wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits it.

3. Physical Distancing Required If Employee Is Not Wearing Face Covering or Non-Restrictive Alternative

The **County of Imperial**'s policy requires that any employees not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six (6) feet apart from all other persons unless the unmasked employees are tested at least twice (2x) weekly for COVID-19.

However, the **County of Imperial** does not use COVID-19 testing as an alternative to face coverings when face coverings are otherwise required by this section.

4. Prohibition on Preventing Employees from Wearing Face Covering

The **County of Imperial** does not prevent any **County of Imperial** employee from wearing a face covering when wearing a face covering is not required by this section, unless not wearing a face covering would create a safety hazard, such as interfering with the safe operation of equipment.

5. Communication to Non-Employees Regarding Face Covering Requirement

The **County of Imperial** posts signage to inform non-employees that the **County of Imperial** requires the use of face coverings at **County of Imperial** worksites and facilities.

6. Policies to Reduce COVID-19 Hazards Originating from Persons Not Wearing Face Coverings

The **County of Imperial** has developed COVID-19 policies and procedures to minimize employees' exposure to COVID-19 hazards originating from any person not wearing a face covering, including a member of the public.

These policies include requiring that employees and non-employees wear face coverings at **County of Imperial** worksites and facilities, that **County of Imperial** employees wear face coverings at other times, maintain physical distance from person not wearing a face covering, and observe proper hand hygiene.

H. OTHER ENGINEERING CONTROLS, ADMINISTRATIVE CONTROLS AND PERSONAL PROTECTIVE EQUIPMENT (PPE)

1. **Installation of Solid Partitions Between Workstations Where Physical Distancing is Not Possible**

At fixed work locations where it is not possible to maintain the physical distancing requirement at all times, the County shall install cleanable solid partitions that effectively reduce aerosol transmission between the employees and other persons.

2. **Maximization of Outdoor Air**

As provided above at Section IV.B.5., for indoor **County of Imperial** worksites and facilities, the **County of Imperial** evaluated how to maximize the quantity of outdoor air.

Further, for **County of Imperial** worksites and facilities with mechanical or natural ventilation, or both, the **County of Imperial** has maximized 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 letting in outdoor air by other means would cause a hazard to **County of Imperial** employees, for instance from excessive heat, cold or other safety related concerns.

3. **Cleaning and Disinfecting Procedures**

The **County of Imperial**'s cleaning and disinfecting policy requires the following:

Identifying and regularly cleaning and disinfecting frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, bathroom surfaces, and steering wheels. The **County of Imperial** will inform employees and authorized employee representatives of cleaning and disinfection protocols, including the planned frequency and scope of regular cleaning and disinfection.

Prohibiting the sharing of personal protective equipment and to the extent feasible, items that employees come in regular physical contact with such as phones, headsets, desks, keyboards, writing materials, instruments, and tools. When it is not feasible to prevent sharing, sharing will be minimized and such items and equipment shall be disinfected between uses by different people. Sharing of vehicles will be minimized to the extent feasible, and high touch points (steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) shall be disinfected between users.

Cleaning and disinfection of areas, material, and equipment used by a COVID-19 case during the high-risk exposure period.

Further, the **County of Imperial** requires that cleaning and disinfecting must be done in a manner that does not create a hazard to **County of Imperial** employees or subcontracted employees.

4. **Evaluation of Handwashing Facilities**

In order to protect **County of Imperial** employees, the **County of Imperial** evaluated its handwashing facilities in order to determine the need for additional facilities, encourage

and allow time for employee handwashing, and provide employees with an effective hand sanitizer.

The **County of Imperial** encourages **County of Imperial** employees to wash their hands for at least 20 seconds each time.

The **County of Imperial** does not provide hand sanitizers with methyl alcohol.

5. Personal Protective Equipment (PPE)

County of Imperial policy provides for PPE.

The **County of Imperial** evaluates the need for PPE, such as gloves, goggles, and face shields, to prevent exposure to COVID-19 hazards and provide such PPE as needed.

In accordance with applicable law, the **County of Imperial** evaluates the need for respiratory protection when the physical distancing requirements, as provided herein, are not feasible or are not maintained.

In accordance with applicable law, the **County of Imperial** will provide and ensure use of respirators in accordance when deemed necessary by Cal/OSHA through the Issuance of Order to Take Special Action.

In accordance with applicable law, the **County of Imperial** will provide and ensure use of eye protection and respiratory protection when **County of Imperial** employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

I. REPORTING, RECORDKEEPING AND ACCESS

1. Reporting COVID-19 Cases to the Local Health Department

In accordance with applicable law, the **County of Imperial** will report information about COVID-19 cases at the workplace to the local health department.

Further, the **County of Imperial** will provide any related information requested by the local health department.

2. Reporting Serious COVID-19 Illnesses and Deaths to Cal/OSHA

In accordance with applicable law, the **County of Imperial** will immediately report to Cal/OSHA any serious COVID-19-related illnesses or deaths of **County of Imperial** employees occurring at a **County of Imperial** worksite or facility or in connection with any employment.

Further, in accordance with applicable law, the **County of Imperial** will record any serious work-related COVID-19-related illnesses or deaths.

3. Maintenance of Records Related to the Adoption of the CPP

In accordance with applicable law, the **County of Imperial** will maintain records of the steps taken to implement this CPP.

4. Availability of the CPP for Inspection

The **County of Imperial** will make this written CPP available to employees and employee organizations at **County of Imperial** worksites or facilities.

Further, the **County of Imperial** will make this written CPP available to Cal/OSHA representatives immediately upon request.

5. Records Related to COVID-19 Cases

The **County of Imperial** will keep a record of and track all COVID-19 cases with the following information: (1) employee's name; (2) contact information; (3) occupation; (4) location where the employee worked; (5) the date of the last day at the workplace; and (6) the date of a positive COVID-19 test.

In accordance with the Confidentiality of Medical Information Act (CMIA) and applicable law, the **County of Imperial** will keep the employees' medical information confidential.

In accordance with the CMIA and applicable law, the **County of Imperial** will make this information available to employees and employee organizations with personal identifying information removed. The **County of Imperial** will also make this information available as otherwise required by law.

J. EXCLUSION OF COVID-19 CASES

1. Exclusion of COVID-19 Cases from County of Imperial Worksites and Facilities

The **County of Imperial** will ensure that COVID-19 cases are excluded from the workplace until the individual satisfies the minimum return to work criteria provided for in Section IV.K.

2. Exclusion of Employees with Close Contact COVID-19 Exposures from County of Imperial Worksites and Facilities

The **County of Imperial** will exclude employees with close contact COVID-19 exposure from the workplace in accordance to applicable self-quarantine health orders.

3. Provision of Benefits to County of Imperial Employees Excluded from Work as a Result of a Positive COVID-19 Test or Diagnosis or a Close Contact COVID-19 Exposure

a. Employees Who Are Able to Telecommute During Isolation or Quarantine Period

The **County of Imperial** will allow employees who are able to telecommute, and are able and available to work, to telecommute during the isolation or quarantine period. The

County of Imperial will provide these employees their normal compensation for the work that they perform for the **County of Imperial** during the isolation or quarantine period.

b. Employees Who Are Unable to Telecommute During Isolation or Quarantine Period

For employees where the County of Imperial has determined to be a work related close contact COVID-19 exposure, the County will allow them to telecommute and/or receive paid leave for the period of self-quarantine. Non-work related exposures that must self-quarantine or who have tested positive for COVID-19, may use any applicable leave under the FFCRA and Labor Code section 248.1 and/or use their accruals to cover their absence. Employees may elect to take leave without pay during this time.

For all employees who are subject to an isolation or quarantine because of a COVID-19 case or a close contact COVID-19 exposure, the **County of Imperial** will maintain the employees' rights and benefits, including the employees' right to their former job status, during the isolation or quarantine period.

The **County of Imperial** may consider benefit payments from public sources, including under the FFCRA and Labor Code section 248.1 (until December 31, 2020 or longer if FFCRA leave and/or Labor Code section 248.1 leave is extended), in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers' compensation.

4. Adherence with Laws, Policies, and/or Agreements Providing Excluded Employees Greater Protections

The obligations set forth in this section do not limit any other applicable law, **County of Imperial** policy, or collective bargaining agreement that provides **County of Imperial** employees with greater protections or benefits.

5. Provision of Information Concerning Benefits to Excluded Employees

At the time of exclusion, the County of Imperial will provide the excluded employees the information on benefits to which the employees may be entitled under applicable federal, state, or local laws.

This includes any benefits available under workers' compensation law, the FFCRA, Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, the **County of Imperial's** own leave policies, and leave guaranteed by contract.

K. RETURN TO WORK CRITERIA

1. Minimum Criteria to Return to Work for Symptomatic COVID-19 Cases

County of Imperial policy requires that COVID-19 cases with COVID-19 symptoms remain at their home or place of residence and not report to any **County of Imperial** worksite or facility until they satisfy each of the following conditions:

1. At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications;
2. Receive clearance by a medical provider (County will make a medical provider available at no cost to the employee if requested)
3. At least 10 days have passed since COVID-19 symptoms first appeared.

2. **Minimum Criteria to Return to Work for Asymptomatic COVID-19 Cases**

County of Imperial policy requires that COVID-19 cases who tested positive but never developed COVID-19 symptoms not report to any **County of Imperial** worksite or facility until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.

3. **COVID-19 Testing Not Required in Order to Return to Work**

In accordance with CDC guidance concerning symptom-based strategies for the discontinuation of isolation, the **County of Imperial** does not require employees submit to a COVID-19 test, or produce a negative COVID-19 test result, in order to return to work.

4. **Minimum Criteria to Return to Work for Employees Directed to Self-Quarantine or Isolate by a State or Local Health Official**

If employees are subject to an isolation or quarantine order issued by a state or local health official, **County of Imperial** policy requires that the employees not report to any **County of Imperial** worksite or facility until the period of isolation or quarantine is completed or the order is lifted.

The quarantine and isolation periods will be determined by local health orders.

5. **Allowance by Cal/OSHA for an Employee to Return to Work**

If there are no violations of state or local health officer orders for isolation or quarantine, Cal/OSHA may, upon request, allow employees to return to work on the basis that the removal of employees would create undue risk to a community's health and safety.

In such cases, the **County of Imperial** will develop, implement, and maintain effective control measures to prevent transmission in the workplace including providing isolation for the employees at the **County of Imperial** worksite or facility and, if isolation is not possible, the use of respiratory protection in the workplace.