



VCCCD COVID-19 Prevention Program (CPP)

June 30, 2021

PURPOSE:

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

Nothing in this CPP precludes the VCCCD from complying with federal, state, or local laws or public health order or guidance, or District policy or procedure that recommends or requires measures that are more prescriptive or restrictive than those that are provided herein. Further, it must be noted that as circumstances change in the community, VCCCD will adjust protocols accordingly.

I. SCOPE

Unless one of the exceptions provided below applies, this CPP shall apply to all VCCCD employees (hereinafter referred to as "employees"), including those who are "fully vaccinated."

The following employees are exempt from coverage under the CPP: (1) Employees who are teleworking from home or a location of the employee's choice that is not under the control of the VCCCD; (2) Employees who are working in or at a work location and do not have contact with any other individuals; and (3) Employees that because of their tasks, activities or work location have occupational exposure as defined by the Aerosol Transmissible Diseases ("ATD") regulation (*i.e.*, 8 C.C.R. § 5199), and are therefore covered by that regulation.

II. DEFINITIONS:

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

"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.

Employees who were wearing a respirator (defined below in this section) as required by the VCCCD and who used such respirator in compliance with Title 8 Section 5144 during contact with a COVID-19 case will be deemed not to have had close contact COVID-19 exposure.

"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; (3) Has a positive COVID-19 diagnosis from a licensed health care provider; or (4) 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.

“COVID-19 hazard” means 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, or sneezing, or from procedures performed on persons which may aerosolize saliva or respiratory tract fluids. 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 (“EUA”) 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 EUA as applicable.

“Exposed group” means all employees at a work location, working area, or a common area at work, where a COVID-19 case was present at any time during the high-risk exposure period. However, if the COVID-19 case visited a work location, working area, or a common area at work for less than 15 minutes during the high-risk exposure period, and the COVID-19 case was wearing a face covering the entire time they were present, other people at the work location, working area, or common area would not constitute part of the exposed group. Common areas at work include bathrooms, walkways, hallways, aisles, break or eating areas, and waiting areas. However, places where employees momentarily pass through while everyone is wearing face coverings, without congregating, is not a work location, working area, or a common area at work.

“Face covering” means 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.

“Fully vaccinated” means the VCCCD has documented that the person received, at least 14 days prior, either the second dose in a two-dose COVID-19 vaccine series or a single-dose COVID-19 vaccine. Vaccines must be FDA approved; have an emergency use authorization from the FDA; or, for persons fully vaccinated outside the United States, be listed for emergency use by the World Health Organization (WHO).

“High-risk exposure period” means the following: For COVID-19 cases who develop COVID-19 symptoms: from two (2) days before they first develop symptoms until each of the following are true: (1) it has been ten (10) days since

symptoms first appeared; (2) 24 hours have passed with no fever, without the use of fever-reducing medications; and (3) symptoms have improved; or For COVID-19 cases 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.

“Respirator” means a respiratory protection device approved by the National Institute for Occupational Safety and Health (“NIOSH”) to protect the wearer from particulate matter, such as an N95 filtering face-piece respirator.

“Worksite,” for the limited purposes of COVID-19 prevention regulations only, means the building, store, facility, agricultural field, or other location where a COVID-19 case was present during the high-risk exposure period. It does not apply to buildings, floors, or other locations of the VCCCD that a COVID-19 case did not enter.

III. PROGRAM

A. SYSTEM FOR COMMUNICATING WITH EMPLOYEES

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

The VCCCD requires that employees immediately report to their manager or supervisor or to the Office of 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 VCCCD worksites or facilities.

The VCCCD has not and will not discriminate or retaliate against any employee who makes such a report.

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

The VCCCD 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 providers as placing or potentially placing the employees at increased risk of severe COVID-19 illness.

For all employees who request such an accommodation, including fully vaccinated employees, the VCCCD will require that the employee provide information from the employee’s health care provider explaining why the employee requests an accommodation.

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:

1. Cancer;
2. Chronic kidney disease;
3. COPD (chronic obstructive pulmonary disease);
4. Heart conditions, such as heart failure, coronary artery disease, or cardiomyopathies;
5. Immunocompromised state (weakened immune system) from solid organ transplant;
6. Obesity (body mass index [BMI] of 30 kg/m² or higher but < 40 kg/m²)
7. Severe Obesity (BMI ≥ 40 kg/m²);
8. Pregnancy;
9. Sickle cell disease;
10. Smoking; and
11. 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:

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

The VCCCD periodically reviews 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> (Last updated on May 13, 2021).

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, employees should review the information found on the VCCCD website under Human Resources. Accommodation requests will be reviewed by HR Staff in compliance with ADA/FEHA regulations.

3. COVID-19 Testing

The VCCCD may require COVID-19 testing for employees who report to VCCCD worksites or facilities.

Where the VCCCD requires testing, the VCCCD has adopted policies and procedures that ensure the confidentiality of employees' medical information and comply with the Confidentiality of Medical Information Act ("CMIA"). Specifically, the VCCCD 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 otherwise permitted or required under the law.

4. COVID-19 Hazards

The VCCCD will notify employees and independent contractors of any potential COVID-19 exposure at a District worksite or facility where a COVID-19 case and employees were present on the same day. The VCCCD will notify 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 VCCCD will also notify employees of cleaning and disinfecting measures the VCCCD is undertaking in order to ensure the health and safety of the VCCCD worksite or facility where the potential exposure occurred.

B. IDENTIFICATION AND EVALUATION OF COVID-19 HAZARDS AT VCCCD WORKSITES AND FACILITIES

1. Screening Employees for COVID-19 Symptoms

The VCCCD possesses authority to require that employees self-screen for COVID-19 symptoms.

The VCCCD provides that employees will self-screen for COVID-19 symptoms by completing the Daily Screening Form in the MyVCCCD app prior to reporting to any VCCCD worksite or facility. Each location will establish on-site screening stations to validate and identify fully vaccinated employees and review the pre-screening information to validate approval to be on-site. The use of face coverings is voluntary for validated fully vaccinated employees.

2. Responding to Employees with COVID-19 Symptoms

Should an employee present COVID-19 symptoms during the self-screen, the employee must remain at or return to their home or place of residence and contact their supervisor and Student Health representatives. They are to follow the advice of their Student Health representative which may include reporting to work or not reporting to work until such time as the employee satisfies the minimum criteria in order to return to work (as discussed in Section IV.J. of this CPP) should COVID-19 be suspected and confirmed.

The VCCCD will advise employees of any leaves to which they may be entitled during this self-quarantine period, including, but not limited to COVID-19 Supplemental Paid Sick Leave (“SPSL”).

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

3. VCCCD’s Response to COVID-19 Cases

In the event that an employee tests positive for COVID-19 or is diagnosed with COVID-19 by a health care provider, the VCCCD 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 they satisfy the minimum criteria to return to work (as discussed in Section IV.J. of this CPP).

The VCCCD will advise employees of any leaves to which they may be entitled during this self-isolation period, including, but not limited to SPSL.

The VCCCD complies fully and faithfully 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 entities as required based on the individual circumstances: (1) The local health department; (2) Cal/OSHA; (3) Employees who were present at a VCCCD worksite or facility when a COVID-19 case was present; (4) Employee organizations that represent employees at the VCCCD worksite or facility; (5) Employers of any subcontracted employees who were present at the VCCCD worksite or facility; and (6) The VCCCD’s workers’ compensation plan administrator.

If possible, the VCCCD will interview the COVID-19 case(s) in order to ascertain the nature and circumstances of any contact that the employee(s) had or may have had with other employees during the high-risk exposure period. If the VCCCD determines that there were any close contact COVID-19 exposures, the VCCCD will instruct those employees to remain at 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 (as discussed in Section IV.J. of this CPP).

The VCCCD has adopted policies and procedures that will ensure the confidentiality of employees and comply with the CMIA. Specifically, the VCCCD will not disclose to other employees, except for those who need to know, the fact that the employee(s) tested positive for or were diagnosed with COVID-19. Further, the VCCCD 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 otherwise permitted or required under the law.

4. Workplace-Specific Identification of COVID-19 Hazards

The VCCCD will periodically conduct workplace-specific assessments of all interactions, areas, activities, processes, equipment, and materials that could potentially expose employees to COVID-19 hazards.

As part of this process, the VCCCD identified places (work locations, work areas, and common areas) 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.

The VCCCD will provide notice of any such potential workplace exposure to all persons at VCCCD worksites and facilities, including employees, employees of other entities, members of the public, customers or clients, and independent contractors. The VCCCD considered how employees and other persons enter, leave, and travel through VCCCD worksites and facilities, in addition to addressing employees' stationary workspaces or workstations.

Further, the VCCCD will treat all persons, regardless of the presentation of COVID-19 symptoms or COVID-19 status, as potentially infectious.

5. Maximization of Outdoor Air and Air Filtration

For indoor VCCCD worksites and facilities, the VCCCD evaluates how to maximize the ventilation of outdoor air; provide the highest level of filtration efficiency compatible with the worksites and facilities' existing ventilation systems; 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 COVID-19 transmission.

6. VCCCD Compliance with Applicable State and Local Health Orders

The VCCCD monitors applicable public health orders and guidance from the State of California and the local health department related to COVID-19 hazards and prevention.

The VCCCD 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 VCCCD will evaluate existing COVID-19 prevention controls at the workplace and assess alternative 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) (as discussed at Section VI, subsections D, and F-H of this CPP).

8. Periodic Inspections

The VCCCD conducts periodic inspections of VCCCD worksites and facilities as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with the VCCCD's COVID-19 policies and procedures, including, but not limited to this CPP.

C. INVESTIGATING AND RESPONDING TO COVID-19 CASES IN VCCCD WORKSITES AND FACILITIES

1. Procedure to Investigate COVID-19 Cases

The VCCCD developed a procedure for investigating COVID-19 cases in the workplace, which provides for the following: (1) requesting information from employees regarding COVID-19 cases; (2) contact tracing of employees who may have had a close contact COVID-19 exposure; (3) requesting COVID-19 test results from employees who may have had a close contact COVID-19 exposure; (4) requesting information from employees regarding the presentation of COVID-19 symptoms; and (5) 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 an employee tests positive for COVID-19 or is diagnosed with COVID-19 by a health care provider, the VCCCD will instruct the employee to remain at or return to their home or place of residence and not report to a VCCCD worksite or facility until such time as the employees satisfy the minimum criteria to return to work (as discussed in Section IV.J. of this CPP).

a. Contact Tracing

If possible, the VCCCD will interview the COVID-19 case(s) in order to ascertain the following information: (1) the date on which the employee(s) tested positive, if asymptomatic, or the date on which the employee(s) first presented COVID-19 symptoms, if symptomatic; (2) the COVID-19 case(s) recent work history, including the day and time they were last present at a VCCCD worksite or facility; and (3) the nature and circumstances of the COVID-19 case(s)' contact with other employees during the high-risk exposure period, including whether any such contact qualifies as a close contact COVID-19 exposure.

If the VCCCD determines that there was or were any close contact COVID-19 exposures, the VCCCD will instruct those employees to remain at 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 (as discussed in Section IV.J. of this CPP). Further, the VCCCD will instruct those employees to be tested for COVID-19, and that the VCCCD will provide for such testing during paid time, as discussed in subsection c. below.

b. Reporting the Potential Exposure to Other Employees

The VCCCD fully and faithfully complies with all reporting and recording obligations as required under the law, including, but not limited to, reporting the COVID-19 case to the individuals and entities described below.

Within one (1) business day of the time the VCCCD knew or should have known of a COVID-19 case, the VCCCD will give written notice of a potential workplace exposure to the following individuals: (1) All employees at the worksite or facility during the COVID-19 case's high-risk exposure period, and the authorized representative(s) of those employees; (2) Independent contractors at the worksite or facility during the COVID-19 case's high-risk exposure period; and (3) Other employers at the worksite or facility during the COVID-19 case's high-risk exposure period. The VCCCD will provide notice by either personal service, email, or text message.

The VCCCD's notice(s) will not reveal any personal identifying information of the COVID-19 case. The notice will include information about the VCCCD's disinfection plan.

c. Offer of Free COVID-19 Testing Following a Close Contact COVID-19 Exposure

The VCCCD makes COVID-19 testing available at no cost to employees to all employees who had a close contact COVID-19 exposure at a VCCCD worksite or facility. The VCCCD will offer employees COVID-19 testing during paid time, whether during the employee's regular work schedule or otherwise, and will provide compensation for the time that the employee spends waiting for and being tested.

The VCCCD will not provide free COVID-19 testing to the following two (2) classes of employees: (1) Employees who were fully vaccinated before the close contact COVID-19 exposure and who do not have COVID-19 symptoms, and (2) COVID-19 cases who returned to work pursuant to the criteria set forth in Section K of this CPP 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 symptoms, for 90 days after the first positive test.

d. Leave and Compensation Benefits for Close Contact Exposures

The VCCCD provides employees that had a close contact COVID-19 exposure with information regarding COVID-19-related benefits to which the employees may be entitled under applicable federal, state, or local law, the VCCCD's own leave policies, and leave guaranteed by contract. These benefits include, but are not limited to, Supplemental Paid Sick Leave.

The VCCCD will continue and maintain these employees' earnings, seniority, and all other employee rights and benefits, including the employees' right to their former job status, as if the employees had not been removed from their jobs.

The VCCCD may require that these employees use VCCCD provided employee sick leave benefits for this purpose and consider benefit payments from public sources in

determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers' compensation.

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

The VCCCD will conduct an investigation in order to determine whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what may be done to reduce exposure to such COVID-19 hazards, if any.

3. Confidential Medical Information

The VCCCD will protect the confidentiality of the COVID-19 cases, and will not disclose to other employees personal identifying information of employees who tested positive for or were diagnosed with COVID-19.

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

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

The VCCCD will timely implement effective strategies to correct unsafe or unhealthy conditions or work practices.

- For example, if the District identifies COVID-19 hazards in the workplace, it may implement controls, policies, or procedures regarding physical distancing, face coverings, engineering controls, administrative controls, and personal protective equipment ("PPE").

Any instances of unsafe or unhealthy conditions or work practices should be reported immediately to a supervisor for timely response to the concern. If the concern is not resolved, the Division Vice President (or Vice Chancellor if the concern is at the District) may be contacted.

E. TRAINING AND INSTRUCTION OF EMPLOYEES

1. COVID-19 Symptoms

The VCCCD provides employees training and instruction on 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 VCCCD monitors and adheres to guidance issued 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 VCCCD will advise employees in the event that the CDC revises the symptoms that its associates with COVID-19.

In addition to providing training and instruction on COVID-19 symptoms, the VCCCD provides information and instruction on the importance of employees not coming to a District worksite if they have any COVID-19 symptoms. As discussed below, the VCCCD provides information on paid leaves to which employees may be entitled if they are experiencing a COVID-19 symptom and would like to be tested for COVID-19.

2. COVID-19 Vaccinations

The VCCCD provides employees information and instruction on the fact that COVID-19 vaccines are effective at both preventing the transmission of the virus that causes COVID-19 and preventing serious illness or death, and how employees may receive paid leave for reasons related to COVID-19 vaccinations.

As discussed below, the VCCCD provides information on paid leaves to which employees may be entitled in order for them to be vaccinated and in the event that they experience any illness or adverse effects as a result of such vaccination.

3. VCCCD's COVID-19 Policies and Procedures

The VCCCD provides regular updates to employees on the VCCCD's policies and procedures adopted in order to prevent COVID-19 hazards at VCCCD worksites and facilities, how such policies and procedures are intended to protect the health and safety of employees at VCCCD worksites and facilities, and how employees may participate in the identification and evaluation of COVID-19 hazards in order to make such worksites and facilities healthier and safer for themselves and others.

4. COVID-19 Related Benefits

The VCCCD advises and provides updates to employees on the leaves to which employees may be entitled under applicable federal, state, or local laws as well as the VCCCD's own leave policies. Paid leave benefits include, but are not limited to, Supplemental Paid Sick Leave.

For example, when employees require leave in order to receive a COVID-19 test or to be vaccinated or are directed not to report to work by the VCCCD for reasons related to the presentation of COVID-19 symptoms, a COVID-19 case, close contact COVID-19 exposure, the VCCCD will advise the employees of the leaves to which the employees may be entitled for that specific reason.

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

The VCCCD advises and provides updates to employees about the known spread and transmission of COVID-19. The VCCCD specifically advises employees of the following: (1) that COVID-19 is an infectious respiratory disease; (2) that the virus that causes COVID-19 can be spread through the air when an infectious person talks or vocalizes,

sneezes, coughs, or exhales; (3) 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; (4) 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 (5) that an infectious person may present no COVID-19 symptoms or be pre-symptomatic.

6. Hand Hygiene, and Face Coverings and Respirators

The VCCCD advises employees of the importance of physical distancing, face coverings, and hand hygiene, including hand washing, and instructs employees that the combination of physical distancing, face coverings, increased ventilation indoors, and respiratory protection make such preventative measures most effective, especially when unvaccinated.

With respect to hand hygiene, the VCCCD provides employees information regarding the importance of frequent hand washing, that hand washing is most effective when soap and water are used and the employees washes for at least 20 seconds. The VCCCD instructs employees to use hand sanitizer when employees do not have immediate access to a hand washing facility (*i.e.*, a sink) and that hand sanitizer will not be effective if the employee's hands are soiled.

With respect to face coverings and respirators, the VCCCD provides employees information on the benefits of face coverings, both to themselves and to others. The VCCCD also provides employees instructions on the proper use of face coverings and the differences between face coverings and respirators. Face coverings are not respiratory protective equipment for the wearer against COVID-19, an airborne disease – they primarily protect people around the user. Respirators, such as N95 masks, protect the user from airborne disease.

Upon request, the VCCCD will provide respirators to employees who are not fully vaccinated and who work indoors or in a vehicle with more than one person. At such time as the VCCCD provides respirators to employees for their use, it will provide such employees training on the proper use of such respirators, including, but not limited to, the method by which employees may check the seal of such respirator in conformance with the manufacturer's instructions. The VCCCD will provide training on the conditions under which face coverings must be worn at the workplace and that face coverings are additionally recommended outdoors for people who are not fully vaccinated if six feet of distance between people cannot be maintained. Employees who are not fully vaccinated have a right to request a respirator for voluntary use at no cost to the employees and without fear of retaliation. Any District employee may request a face covering from the VCCCD at no cost to the employee, and can wear them at work, regardless of vaccination status, without fear of retaliation.

F. FACE COVERINGS

1. General Face Covering Requirements

The VCCCD requires face coverings to all employees who are not fully vaccinated and requires that employees wear these face coverings when indoors or in vehicles, unless certain conditions are satisfied, as explained below. The VCCCD will provide the face coverings upon request and will ensure they are worn by employees when required by federal, state, or local health orders.

The VCCCD requires that employees' face coverings be clean and undamaged. The VCCCD allows employees to use face shields to supplement, not supplant, face coverings. However, face shields are not a replacement or acceptable alternative for a face covering.

2. Limited Exceptions

The VCCCD provides for the following exceptions to the face coverings requirement:

1. When an employee is alone in a room (e.g., alone in an office or another space with walls that extend from the floor to the ceiling and a door that may be closed in order to close the space to others) or vehicle;
2. 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 feasible.
3. Employees wearing respirators required by the VCCCD and being used in compliance with the regulatory requirements for the use of such respirators.
4. 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, where the District has determined it can reasonably accommodate an exemption without undue hardship or a direct threat to the health and safety in the workplace.
5. 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.

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

The VCCCD requires that its employees who are exempted from wearing face coverings through an available reasonable accommodation wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits it.

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

The VCCCD requires that any employees not wearing a face covering due to either exception number 4 or 5, identified in Subsection 2 above, and not wearing a face shield with a drape or other effective alternative as described in Subsection 3 above,

shall remain at least six (6) feet apart from all other persons unless the unmasked employees are tested at least weekly for COVID-19 during paid time and at no cost to the employees, or are fully vaccinated.

In situations where a face covering is otherwise required, face coverings must be worn, and the exceptions to face coverings contained in this section no longer apply.

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

5. Prohibition on Preventing Employees from Wearing Face Covering

The VCCCD does not prevent any employee from wearing a face covering unless wearing a face covering would create a safety hazard, such as interfering with the safe operation of equipment.

6. Communication to Non-Employees Regarding Face Covering Requirement

The VCCCD posts signage to inform non-employees of the VCCCD's requirements concerning the use of face coverings at VCCCD worksites and facilities.

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

1. Maximization of Outdoor Air

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

Further, for VCCCD worksites and facilities with mechanical or natural ventilation, or both, the VCCCD maximizes the quantity of outside air provided to the extent feasible, except when the Environmental Protection Agency ("EPA") Air Quality Index ("AQI") is greater than 100 for any pollutant or if opening windows or letting in outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.

2. Cleaning Procedures

The VCCCD undertakes the following cleaning measures:

1. Identify and regularly clean frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, phone, headsets, bathroom surfaces, and steering wheels;
2. Inform employees and authorized employee representatives of the VCCCD's cleaning and disinfection protocols, including the planned frequency and scope of cleaning and disinfection; and
3. Clean areas, material, and equipment used by a COVID-19 case during the high-risk exposure period and disinfection if the area, material, or

equipment is indoors and will be used by another employee within 24 hours of the COVID-19 case.

Further, the VCCCD requires that cleaning must be done in a manner that does not create a hazard to employees or subcontracted employees who do the cleaning and disinfecting.

3. Evaluation of Handwashing Facilities

In order to protect employees, the VCCCD evaluates 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 VCCCD encourages employees to wash their hands with soap and water for at least 20 seconds each time.

The VCCCD does not provide hand sanitizers with methyl alcohol.

4. Personal Protective Equipment (“PPE”)

a. Evaluation of the Need for PPE

The VCCCD evaluates the need for PPE in order to prevent employees from being exposed to COVID-19 hazards.

b. Provision of PPE When Necessary

The VCCCD provides PPE, including, but not limited to, eye protection, face coverings, respirators, gloves, goggles, and face shields, to and for employees who require such equipment in order to perform their job duties in a healthy and safe manner, including where employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

As noted above in Section E(6), upon request, the VCCCD shall 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. Whenever the VCCCD makes respirators available for voluntary use, the VCCCD will ensure that employees receive a respirator of the correct size and will provide such employees training on the proper use of such respirators, including, but not limited, the method by which employees may check the seal of such respirator in conformance with the manufacturer’s instructions, as discussed in Section IV.E.6.

5. Testing of Symptomatic Employees Who Are Not Fully Vaccinated

The VCCCD makes COVID-19 testing available at no cost to employees with COVID-19 symptoms who are not fully vaccinated. This testing will be made available during the employees’ paid time. COVID-19 testing is required monthly for all employees who are not fully vaccinated and whenever they are symptomatic.

H. REPORTING, RECORDKEEPING AND ACCESS

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

The VCCCD reports COVID-19 cases and COVID-19 outbreaks at VCCCD worksites and facilities to the local health department. Further, the VCCCD provides any related information requested by the local health department.

Maintenance of Records Related to the Adoption of the CPP

The VCCCD maintains records of the steps it has taken to implement this provisions described in this CPP.

2. Availability of the CPP for Inspection

The VCCCD makes this written CPP available to employees and employee organizations at VCCCD worksites or facilities. Further, the VCCCD makes this written CPP available to Cal/OSHA representatives immediately upon request.

3. Records Related to COVID-19 Cases

The VCCCD keeps a record of and tracks 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.

The VCCCD keeps employees' medical information confidential.

I. EXCLUSION OF COVID-19 CASES AND EMPLOYEES WHO HAD A CLOSE CONTACT COVID-19 EXPOSURE

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

The VCCCD ensures that COVID-19 cases are excluded from VCCCD worksites and facilities until the employee satisfies the minimum return to work criteria, as provided in Section IV.J.

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

The VCCCD ensures that employees who had a close contact COVID-19 exposure are excluded from VCCCD worksites and facilities until the employee satisfies the minimum return to work criteria, as provided in Section IV.J, except in the following circumstances.

The VCCCD may allow the following employees who had a close contact to continue to report to VCCCD worksites and facilities without exclusion from the workplace: (1) Employees who were fully vaccinated before the close contact COVID-19 exposure and who have not developed COVID-19 symptoms since such exposure; and (2) COVID-19 cases who returned to work pursuant to the return to work criteria, as provided in

Section IV.J, 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 COVID-19 test.

3. Benefits for Employees Excluded from the Worksite as a Result of a Positive COVID-19 Test, Diagnosis, or a Close Contact Exposure

a. Employees Who Are Able to Telework during Isolation or Quarantine Period

The VCCCD may allow employees who are able to telework to do so during the isolation or quarantine period. The VCCCD will provide these employees their normal compensation for the work that they perform during the isolation or quarantine period.

The VCCCD continues and maintains such an employee's earnings, wages, seniority, and all other employee rights and benefits, including the employee's right to their former job status, as if the employee had not been removed from their job location.

b. Employees Who Are Unable to Telework during Isolation or Quarantine Period

The following employees are not entitled to the benefits described below: (1) Employees for whom the VCCCD can demonstrate that the close contact COVID-19 exposure was not work-related; and (2) Employees who received disability payments or were covered by workers' compensation and received temporary disability. Such employees may still use paid sick leave for the purpose of receiving compensation during the isolation or quarantine period if they elect to do so.

For other employees, the VCCCD requires that employees who are unable to telework, but are otherwise able and available to work, the VCCCD may use paid sick leave available to the employee, including but not limited to Supplemental Paid Sick Leave ("SPSL"), for the purpose of continuing and maintaining the employee's earnings during the isolation or quarantine period. If the employee has exhausted their SPSL entitlement, the VCCCD may use the employee's paid sick leave in order to continue and maintain the employee's earnings during the isolation or quarantine period.

Employees retain their entitlement to elect not to use other earned or accrued paid leave 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 VCCCD will maintain the employees' seniority and all other employee rights and benefits, including the employees' right to their former job status, during the isolation or quarantine period.

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

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

5. Provision of Information Concerning Benefits to Excluded Employees

At the time of exclusion, the VCCCD provides the excluded employees the information on paid leave benefits to which the employees may be entitled under applicable federal, state, or local laws.

This includes, but is not limited to, COVID-19 Supplemental Paid Sick Leave (“SPSL”) (under Labor Code section 248.2), any paid leave benefits available under workers’ compensation law, Labor Code sections 3212.86 through 3212.88, the VCCCD’s own leave policies, and leave guaranteed by contract.

J. RETURN TO WORK CRITERIA

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

The VCCCD requires that a COVID-19 case with one or more COVID-19 symptoms remain at their home or place of residence and not report to any VCCCD worksite or facility until they satisfy each of the following conditions: (1) At least 24 hours have passed since a fever of 100.4 degrees Fahrenheit or higher has resolved without the use of fever-reducing medications; (2) COVID-19 symptoms have improved; and (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

The VCCCD requires that COVID-19 cases who tested positive but never developed COVID-19 symptoms not report to any VCCCD 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, once an employee has satisfied the criteria to return to work, as provided in this Section, the VCCCD will not require that the employee submit to a COVID-19 test or produce a negative COVID-19 test result, in order to return to VCCCD worksites or facilities.

4. Minimum Criteria to Return to Work for Close Contacts

a. Asymptomatic Employees

An employee who had a close contact COVID-19 exposure, but never developed COVID-19 symptoms may return to VCCCD worksites or facilities 10 days following the last known close contact COVID-19 exposure.

b. Symptomatic Employees

Except as provided below, an employee who had a close contact COVID-19 exposure and developed one or more COVID-19 symptom may not return to VCCCD worksites or facilities until they satisfy each of the following conditions: (1) At least 24 hours have passed since a fever of 100.4 degrees Fahrenheit or higher has resolved without the use of fever-reducing medications; (2) COVID-19 symptoms have improved; and (3) At least 10 days have passed since COVID-19 symptoms first appeared.

An employee who had a close contact COVID-19 exposure and developed one or more COVID-19 symptom may return earlier under each of the following conditions: (1) The employee tested negative for COVID-19 using a polymerase chain reaction ("PCR") COVID-19 test with specimen taken after the onset of symptoms; (2) At least 10 days have passed since the last known close contact COVID-19 exposure; and (3) The employee has been symptom-free for at least 24 hours, without using fever reducing medications.

c. Critical Staffing Shortages

During critical staffing shortages, when there is an insufficient number of emergency response workers, workers in such job classifications may return to VCCCD worksites or facilities seven (7) days following the last known close contact COVID-19 exposure if they have received a negative PCR COVID-19 test result from a specimen collected five (5) days after the close contact COVID-19 exposure

5. 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, the VCCCD requires that the employees not report to any VCCCD worksite or facility until the period of isolation or quarantine is completed or the order is lifted.

If the relevant order did not specify a definite isolation or quarantine period, then the VCCCD will require that employees isolate or quarantine according to the applicable periods and criteria provided for in this Section or as otherwise instructed by the VCCCD.

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

If no violations of state or local health officer orders related to the employee's isolation, quarantine, or exclusion would result, the VCCCD may request that Cal/OSHA waive the quarantine or isolation requirement for essential employees and allow such employees to return to work on the basis that the removal of employees would create undue risk to a community's health and safety.

Where the absence of an essential employee from the VCCCD worksite would cause a staffing shortage that would have an adverse effect on a community's health and safety and pose an undue risk to the community's health and safety as a result, Cal/OSHA may grant such waiver.

In order to request a waiver under such circumstances, the VCCCD will submit the written request to rs@dir.ca.gov. In the event of an emergency, the VCCCD may request a provisional waiver by contacting the local Cal/OSHA office while the VCCCD prepares the written waiver request.

The written waiver request must provide for the following information:

1. Employer name and business or service;
2. Employer point-of-contact name, address, email and phone number;
3. Statement that there are no local or state health officer orders for isolation or quarantine of the excluded employees;
4. Statement describing the way(s) in which excluding the exposed or COVID-19 positive employees from the workplace impacts the employer's operation in a way that creates an undue risk to the community's health and safety;
5. Number of employees required to be quarantined under the Cal/OSHA regulation, and whether each was exposed to COVID-19 or tested positive for COVID-19; and
6. The employer's control measures to prevent transmission of COVID-19 in the workplace if the employee(s) return or continue to work in the workplace, including the prevention of further exposures. These measures may include, but are not limited to, preventative steps such as isolating the returned employee(s) at the workplace and requiring that other employees use respirators in the workplace.

In addition to submitting a request for a Cal/OSHA waiver, the VCCCD will develop, implement, and maintain effective control measures to prevent transmission in the workplace including providing isolation for the employees at the VCCCD worksite or facility and, if isolation is not feasible, the use of respirators in the workplace.