



# County of Imperial COVID-19 Prevention Program (CPP)

Updated September 2022



## **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 (Lab. 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, local laws, public health order, or guidance that may recommend or require measures that are more prescriptive and/or restrictive than those that are provided herein.

## **II. SCOPE**

Unless one of the exceptions provided below applies, this CPP shall apply to all **County of Imperial** 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 telecommuting from home or a location of the employee's choice that is not under the control of the **County of Imperial**; (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 with occupational exposure as defined by the Aerosol Transmissible Diseases ("ATD") regulation (*i.e.*, 8 C.C.R. § 5199).

## **III. DEFINITIONS:**

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

"Close contact COVID-19 exposure" means sharing the same indoor airspace, e.g., home, clinic waiting room, airplane etc., for a cumulative total of 15 minutes or more over a 24-hour period (for example, three individual 5-minute exposures for a total of 15 minutes) during an infected person's (laboratory-confirmed or a [clinical diagnosis](#)) Infectious period. Employees wore a 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, the disease caused by SARS-CoV-2 (severe acute respiratory syndrome coronavirus 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 test for SARS-CoV-2 that is both: (1) Cleared, approved, or authorized, including in an emergency use authorization (EUA), by the United States Food and Drug Administration (FDA) to detect current infection with the SARS-CoV-2 virus (e.g., a viral test); (2) administered in accordance with the authorized instructions; and (3) not both self-administered and self-read unless observed by the employer or an authorized telehealth proctor.

Examples of tests that satisfy this requirement include tests with specimens that are processed by a laboratory, proctored over-the-counter tests, point of care tests, and tests where specimen collection and processing is either done or observed by an employer.

“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 positive case was wearing a face covering during the entire visit, other people at the work location, working area or common area are not part of the exposed group.

Common areas at work includes 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.

COVID-19 testing will be available at no cost to employees within the exposed group, during employees’ paid time, except for the following:

- Employees who were not present at the workplace during the relevant 14-day period(s).



- For COVID-19 cases who did not develop COVID-19 symptoms after returning to work, pursuant to subsections 3205(c)(10)(A) or (B), no testing is required for 90 days after the initial onset of COVID-19 symptoms or, for COVID-19 cases who never developed symptoms, 90 days after the first positive test.

“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 (i.e., fabrics that do not let light pass through when held up to a light source) that completely covers the nose and mouth and is secured to the head with ties, ear loops, or elastic bands that go behind the head. If gaiters are worn, they shall have two layers of fabric or be folded to make two layers. A face covering is a solid piece of material without slits, visible holes, or punctures, and must fit snugly over the nose, mouth, and chin with no large gaps on the outside of the face. A face covering does not include a scarf, ski mask, balaclava, bandana, turtleneck, collar, or single layer of fabric.

This includes clear face coverings or cloth face coverings with a clear plastic panel that, despite the non-cloth material allowing light to pass through, otherwise meet this definition and which may be used to facilitate communication with people who are deaf or hard-of-hearing or others who need to see a speaker’s mouth or facial expressions to understand speech or sign language respectively.

“Fully vaccinated” means the **County of Imperial** has documented that the person completed, at least two weeks prior, the primary vaccination with a COVID-19 vaccine with, if applicable, at least the minimum recommended interval between doses in accordance with the approval, authorization or listing that its: approved or authorized for emergency use by the FDA; listed for emergency use by the World Health Organization (WHO); or administered as part of a clinical trial at the U.S. site, if the recipient is documented to have primary vaccination with the active (not placebo) COVID-19 vaccine candidate, for which vaccine efficacy has been independently confirmed or if the clinical trial participant at the U.S. site had received a COVID-19 vaccine that is neither approved nor authorized for use by FDA but is listed for emergency use by WHO; or

A person’s status two weeks after receiving the second dose of any combination of two doses of a COVID-19 vaccine that is approved by the FDA, or listed as a two-dose series by the WHO. The second dose of the series must not be received earlier than 17 days (21 days with a 4-day grace period) after the first does.

“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 **County of Imperial** that a COVID-19 case did not enter, locations where the worker worked by themselves without exposure to other employees, or to worker’s personal residence or alternative work location chosen by the worker when working remotely.

#### **IV. PROGRAM**

##### **A. SYSTEM FOR COMMUNICATING WITH EMPLOYEES**

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

The **County of Imperial** requires that employees immediately report to their manager, supervisor or to 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** 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 **County of Imperial** provides an accommodation process to 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.

For all employees who request such an accommodation, including fully vaccinated employees, the **County of Imperial** will require that the employee provide information from the employee’s health care provider explaining why the employee requires 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. Chronic liver disease, such as moderate to severe asthma, bronchiectasis, bronchopulmonary dysplasia, chronic obstructive pulmonary disease, interstitial lung disease, pulmonary embolism, pulmonary hypertension
4. Cystic fibrosis
5. Dementia or other neurological conditions
6. Diabetes (type 1 or type 2)
7. Disabilities, such as, ADHD, cerebral palsy, birth defects, intellectual/developmental disabilities, learning disabilities, spinal cord injuries, down syndrome
8. Heart conditions, such as heart failure, coronary artery disease, or cardiomyopathies
9. HIV infection
10. Immunocompromised state (weakened immune system) from solid organ transplant
11. Mental health conditions such as mood disorders, depression, schizophrenia spectrum disorders)
12. Overweight and obesity
13. Physical inactivity
14. Pregnancy
15. Sickle cell disease or thalassemia
16. Smoking, current or former
17. Solid organ or blood stem cell transplant
18. Stroke or cerebrovascular disease
19. Tuberculosis
20. Substance use disorders



The **County of Imperial** periodically reviews the following website 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>.

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 may 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 testing, the **County of Imperial** 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 **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.

The **County of Imperial** makes COVID-19 testing available at no cost to employees during paid time to:

- Employees working at an outbreak status worksite
- Employees who were potentially exposed at the workplace
- Employees following isolation and quarantine orders
- Employees experiencing COVID-19 symptoms

**During an outbreak** - An outbreak is defined as three (3) or more COVID-19 positive cases within 14 days. COVID-19 positive cases where the employee has been telecommuting and not present at the department/division do not count towards an outbreak. Upon identifying an outbreak, the County will notify the department and employees of testing availability. A second test is offered a week after.

The exception to the above testing requirement is as follows:

- Employees who were not present at the workplace during the relevant 14-day period(s).
- For COVID-19 cases who did not develop COVID-19 symptoms after returning to work pursuant to subsections 3205(c)(10)(A) or (B), no testing is required for 90 days after the initial onset of COVID-19 symptoms or, for



COVID-19 cases who never developed symptoms, 90 days after the first positive test.

The County of Imperial will be making the determination of who does not require a test.

**COVID-19 Potential exposure at the workplace** - Employees who were COVID -19 positive cases and were present at a **County of Imperial** worksite or facility will be interviewed by the County of Imperial to ascertain the nature and circumstances of any contact the employee(s) had or 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 test, as directed by CalOSHA, CDPH, and local health orders.

The exception to the above testing requirement is as follows:

- Persons infected within the prior 90 days do not need to be tested, quarantined, or excluded from work, unless symptoms develop

**Following CDPH Isolation and Quarantine Orders-** Employees who are COVID-19 positive or have been in close contact of a COVID-19 positive case, are required test on 5 day/3-5 day, following state and local isolation and quarantine guidance, as to keep employees working or return to work sooner.

**Experiencing COVID-19 symptoms** – Employees experiencing COVID-19 symptoms: (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.

#### **4. COVID-19 Hazards**

The **County of Imperial** will notify employees and employers' of subcontracted employees of any potential COVID-19 exposure at a **County of Imperial** worksite or facility where a COVID-19 case and employees were present on the same day. The **County of Imperial** 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 **County of Imperial** will also notify employees of cleaning 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 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 ask employees to evaluate their own symptoms before reporting to work. Furthermore, the County of Imperial will request employees their acknowledgement of being symptom-free, when reporting to work at County of Imperial operated worksites and facilities.

## **2. Responding to Employees with COVID-19 Symptoms**

Should an employee present COVID-19 symptoms when at a County operated worksite or facility, the County of Imperial will instruct the employee to return to their home or place of residence and not report 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).

The **County of Imperial** will advise employees of any leaves to which they may be entitled during this self-quarantine period, including, but not limited to any applicable State or Federal COVID related paid leave.

Further, the **County of Imperial** has adopted policies and procedures that will ensure the confidentiality of employees and comply with the CMIA, and the **County of Imperial** 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 an employee tests positive for COVID-19 or is diagnosed with COVID-19 by a health care provider, 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 they satisfy the minimum criteria to return to work (as discussed in Section IV.J. of this CPP).

The **County of Imperial** will advise employees of any leaves to which they may be entitled during this self-isolation period, including, but not limited to State or Federal COVID related paid leaves.

The **County of Imperial** 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 **County of Imperial** worksite or facility when a COVID-19 case was present; (4) Employee organizations that represent employees at the **County of Imperial** worksite or facility; (4) Employers of any subcontracted employees who were present at the **County of Imperial** worksite or facility; and (5) The **County of Imperial's** workers' compensation plan administrator.

If possible, the **County of Imperial** 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 **County of Imperial** determines that there were any close contact COVID-19 exposures, the



**County of Imperial** will implement quarantine directives in accordance to current State and Local Health Orders.

The **County of Imperial** has adopted policies and procedures that will 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 employee(s) 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** 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 **County of Imperial** 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 **County of Imperial** will provide notice of any such potential workplace exposure to employees at **County of Imperial** worksites and facilities, including, employees of other entities, and independent contractors. The **County of Imperial** considers how employees and other persons enter, leave, and travel through **County of Imperial** worksites and facilities, in addition to addressing employees' stationary workspaces or workstations.

#### **5. Maximization of Outdoor Air and Air Filtration**

For indoor **County of Imperial** worksites and facilities, the **County of Imperial** 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. County of Imperial Compliance with Applicable State and Local Health Orders**

The **County of Imperial** 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 **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** evaluates existing COVID-19 prevention controls at the workplace and assess whether different and/or additional controls may be needed.

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 **County of Imperial** conducts 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, including, but not limited to this CPP.

**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** 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 **County of Imperial** will instruct the employee to remain at or return to their home or place of residence and not report to an **County of Imperial** 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 **County of Imperial (through Public Health)** 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 an **County of Imperial** 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 **County of Imperial** determines that there was or were any close contact COVID-19 exposures, the **County of Imperial** will implement quarantine directives in accordance to current State and Local Health Orders. Further, the **County of Imperial** will instruct those employees to be tested for COVID-19, the **County of Imperial** will provide for such testing during paid time, as discussed in subsection c. below.

**b. Reporting the Potential Exposure to Other Employees**

The **County of Imperial** 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 **County of Imperial** knew or should have known of a COVID-19 case, the **County of Imperial** 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; (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 **County of Imperial** will provide notice by either personal service, email, or text message.

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

Within one (1) business day of the time the **County of Imperial** knew or should have known of the COVID-19 case, the **County of Imperial** will also provide the notice of the potential workplace exposure to the authorized representative of any employee at the worksite or facility during the COVID-19 case's high-risk exposure period.

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

The **County of Imperial** makes COVID-19 testing available at no cost to all employees who had a close contact COVID-19 exposure at a **County of Imperial** worksite or facility. The **County of Imperial** 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 **County of Imperial** will not provide free COVID-19 testing to the following two classes of employees: (1) 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 and (2) Employees who were not present at the workplace during the relevant 14-day period(s).



**d. Leave and Compensation Benefits for Close Contact Exposures**

The **County of Imperial** 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 **County of Imperial's** own leave policies, and leave guaranteed by contract. These benefits include, but are not limited to, state and federal COVID-19 paid leave options.

The **County of Imperial** 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 **County of Imperial** may require that these employees use **County of Imperial** - 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 **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 may be done to reduce exposure to such COVID-19 hazards, if any.

**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 EMPLOYEES**



## **1. COVID-19 Symptoms**

The **County of Imperial** 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 **County of Imperial** 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 **County of Imperial** 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 **County of Imperial** provides information and instruction on the importance of employees not coming to work if they have any COVID-19 symptoms. As discussed below, the **County of Imperial** 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 **County of Imperial** 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 **County of Imperial** 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. 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 adopted in order to prevent COVID-19 hazards at **County of Imperial** worksites and facilities, how such policies and procedures are intended to protect the health and safety of employees and **County of Imperial** 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 **County of Imperial** 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 **County of Imperial's** own leave policies. Paid leave benefits include, but are not limited to, state and federal COVID-19 paid leave options.

Further, 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 **County of Imperial** for reasons related to the presentation of COVID-19 symptoms, a COVID-19 case, close contact COVID-19 exposure, the **County of Imperial** 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 **County of Imperial** advises and provides updates to employees about the known spread and transmission of COVID-19. The **County of Imperial** 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 have present no COVID-19 symptoms or be pre-symptomatic.

#### **6. Hand Hygiene, and Face Coverings and Respirators**

The **County of Imperial** 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.

With respect to hand hygiene, the **County of Imperial** 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 **County of Imperial** 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 **County of Imperial** provides employees information on the benefits of face coverings, both to themselves and to others. The **County of Imperial** also provides employees instructions on the proper use of face coverings and the differences between face coverings and respirators.

The **County of Imperial** provides respirators to its employees who request the devices for their use at work. At such time as the **County of Imperial** 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.



Training links provided below:

<https://www.osha.gov/sites/default/files/publications/OSHA4015.pdf>

The **County of Imperial** 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 can request face coverings from the **County of Imperial** at no cost to the employee and can wear them at work, without fear of retaliation.

## **F. FACE COVERINGS**

To obtain the most-up-to-date Face Covering Orders and Guidelines, information links provided below:

[State & County Orders | Imperial County Public Health Department \(icphd.org\)](https://www.icphd.org)

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

## **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 **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** 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 **County of Imperial** 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 **County of Imperial**'s cleaning protocols, including the planned frequency and scope of cleaning; and





3. Clean areas, material, and equipment used by a COVID-19 case during the high-risk exposure period, 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 **County of Imperial** requires that cleaning must be done in a manner that does not create a hazard to employees or subcontracted employees who do the cleaning.

### **3. Evaluation of Handwashing Facilities**

In order to protect employees, the **County of Imperial** 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 **County of Imperial** encourages employees to wash their hands with soap and water for at least 20 seconds each time.

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

### **4. Personal Protective Equipment (“PPE”)**

#### **a. Evaluation of the Need for PPE**

The **County of Imperial** evaluates the need for PPE in order to prevent employees from being exposed to COVID-19 hazards.

#### **b. Provision of PPE When Necessary**

The **County of Imperial** provides PPE, including, but not limited to, 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.

Upon request, the **County of Imperial** shall provide respirators to employees for voluntary use to all employees who are working indoors or in vehicles with more than one person. Whenever the **County of Imperial** makes respirators available for voluntary use, the **County of Imperial** 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.

## **H. REPORTING, RECORDKEEPING AND ACCESS**

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



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

**2. Maintenance of Records Related to the Adoption of the CPP**

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

**3. Availability of the CPP for Inspection**

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

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

**4. Records Related to COVID-19 Cases**

The **County of Imperial** 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 **County of Imperial** 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 County of Imperial Worksites and Facilities**

The **County of Imperial** ensures that COVID-19 cases are excluded from **County of Imperial** 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 County of Imperial Worksites and Facilities**

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

The **County of Imperial** may allow employees to continue to report to **County of Imperial** worksites and facilities but only in accordance with OSHA or state/local health orders, whichever is shorter.

For the most updated isolation and quarantine periods, please refer to the latest Local Health Orders.



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

**a. Employees Who Are Unable to work During Isolation or Quarantine Period**

The following employees are not entitled to the benefits described below: (1) Employees for whom the **County of Imperial** 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.

For other employees, the **County of Imperial** requires that employees may use paid sick leave available to the employee, including but not limited to state or federal paid leave options, for the purpose of continuing and maintaining the employee's earnings during the isolation or quarantine period. If the employee has exhausted any applicable state or federal paid leave entitlement, the **County of Imperial** may use the employee's paid sick leave in order to continue and maintain the employee's earnings during the isolation or quarantine period but only as permitted by law.

Employees may elect to take an unpaid leave of absence in lieu of using their accrued leave balances. Should the employee not have accrued leave balances to use or deplete them while out sick, please contact Human Resources.

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' 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/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 employees with greater protections or benefits.

**5. Provision of Information Concerning Benefits to Excluded Employees**

At the time of exclusion, the **County of Imperial** 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, any paid leave benefits available under workers' compensation law, Labor Code sections 3212.86 through 3212.88, the **County of Imperial's** own leave policies, and leave guaranteed by contract.



**J. RETURN TO WORK CRITERIA**

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

In accordance to CALOSHA, County of Imperial abides to State (California Department of Public Health CDPH) guidance to enforce isolation and quarantine periods, subject return to work dates. Furthermore, the **County of Imperial** 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.

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

The **County of Imperial** 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 the completion of their isolation period, in accordance to local isolation orders.

The County has the discretion to allow additional return to work criteria consistent with applicable state or local health orders. This includes reduced isolation or quarantine periods, where permitted.

For the most updated isolation and quarantine periods, please refer to the latest County's health orders.

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

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 **County of Imperial** will not require that the employee who recently tested positive for COVID-19 submit to a COVID-19 test or produce a negative COVID-19 test result, in order to return, past a 10 day isolation period, to **County of Imperial** worksites or facilities.

The County has the discretion to allow additional return to work criteria consistent with applicable state or local health orders. This includes reduced isolation or quarantine periods where permitted.

**4. Minimum Criteria to Return to Work for Close Contacts**

**a. Non-vaccinated Employees working at High Risk Settings**

An employee who had a close contact COVID-19 exposure, but never developed COVID-19 symptoms may return to **County of Imperial** worksites or facilities on the 6<sup>th</sup> day following the last known close contact COVID-19 exposure when testing negative for COVID-19 on day 5 from a medical facility. The following facilities are considered High Risk Settings:



- Public Health Main Building
- All Behavioral Health worksites
- Betty Jo Mc Neece Receiving Home
- ICSO Correctional Facilities
- Juvenile Hall
- County operated cooling centers/shelters

The County has the discretion to allow additional return to work criteria consistent with applicable state or local health orders. This includes reduced isolation or quarantine periods where permitted.

For the most updated isolation and quarantine periods, please refer to the County's health orders.

#### **b. Symptomatic Employees**

An employee who had a close contact COVID-19 exposure and developed one or more COVID-19 symptom may not return to **County of Imperial** worksites or facilities until they satisfy the conditions, including applicable testing requirements, set forth in any applicable state or local health order.

For the most updated isolation and quarantine periods, please refer to the County's health order.

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

The **County of Imperial** will not be able to seek a waiver from Cal/OSHA. Exposed employees must comply with their quarantine order and be off the workplace. Please review section IV.J.5 for exceptions to the quarantine order.



## **Addendum A**

**The following is applicable when the use of Face Coverings are required by Local Health Officer Orders and/or Guidelines established by the California Department of Public Health (CDPH):**

### **1. General Face Covering Requirements**

The **County of Imperial** provides face coverings to all employees. Employees must directly contact their Supervisor to obtain face coverings.

The **County of Imperial** adheres to the most restrictive or prescriptive public health order provided by the CDC, CDPH or the local health department applicable to the **County of Imperial**, and will provide face coverings and ensure they are worn by employees when required by orders from the CDPH.

The **County of Imperial** requires that employee's face coverings be clean and undamaged. The **County of Imperial** allows employees to use face shields to supplement, not replace face coverings.

The **County of Imperial** reserves the right to reinstate the County Vaccination Status Certification Program when allowed under the Local Health Order.

### **2. Limited Exceptions**

The **County of Imperial** 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.

Although there is no direct guidance from OSHA, it is requested that **County of Imperial** departments do not allow potlucks or other departmental gatherings for the time being, as congregating around food service areas may present risks.

Per guidance from CDC, if food is offered at any meetings or for employees, have individual, pre-packaged boxes or bags of items. Avoid sharing food and utensils.



3. Employees wearing respirators required by the **County of Imperial** 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.
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 **County of Imperial** requires that its employees who are exempt 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. If their condition or disability does not permit a non-restrictive alternative, the employee shall be at least six feet apart from all other persons and either be fully vaccinated or tested at least weekly for COVID-19 during paid time and at no cost to the employee.

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

The **County of Imperial** requires that any employees not wearing a face covering due to either exception number 4 or 5, identified in Subsection 2 above, shall remain at least six (6) feet apart from all other persons and either be tested at least weekly for COVID-19 during paid time and at no cost to the employee or be 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 **County of Imperial** 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 **County of Imperial** does not prevent any 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.

**6. Communication to Non-Employees Regarding Face Covering Requirement**



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