

# City of Lindsay

**COVID-19 Prevention Program**

**01/28/2023**



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This COVID-19 Prevention Program (CPP) is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace.

**Date:** 01/28/2023

### **Scope**

This policy applies to all employees with the following exceptions:

- a. Work locations with one employee who does not have contact with other persons
- b. Employees working from home
- c. Employees with occupational exposure as defined by Cal/OSHA Title 8 Section 5199, when covered by that section
- d. Employees teleworking from a location of the employee's choice that is not under the control of City of Lindsay

City of Lindsay will check for the most current information from the California Department of Public Health (CDPH) including guidance documents, Health Orders, and Executive Orders from the Governor's Office and county and local health departments and follow the most current information. Some provisions of Cal/OSHA's COVID-19 emergency regulation may be suspended, or more stringent requirements may need to be implemented based on updated guidance and orders from the CDPH and the Governor's Office through the issuance of updated or new Executive Orders and county or local health department regulations.

### **Authority and Responsibility**

Joe Tanner, City Manager has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all department heads, managers, and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

All employees are responsible for using safe work practices; following all directives, policies, and procedures; and assisting in maintaining a safe work environment.

### **Identification and Evaluation of COVID-19 Hazards**

We will implement the following in our workplace:

- Evaluate employees' potential workplace exposures to all persons at or who may enter our workplace
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention

- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls. COVID-19 prevention controls include remote work, physical distancing, reducing the density of people indoors, moving indoor tasks outdoors, implementing separate shifts and/or break times, restricting access to the work area, and other prevention measures.
- All city facilities are professionally cleaned once per week.

### **Investigating and Responding to COVID-19 Cases**

City of Lindsay will investigate COVID-19 illness at the workplace and determine the day and time a COVID-19 case was last present and to the extent possible, the date of the positive COVID-19 test(s) and/or diagnosis, and the date the COVID-19 case first had one or more COVID-19 symptoms, if any were experienced. This will be accomplished by using the Appendix B: Investigating COVID-19 Cases form.

City of Lindsay will immediately exclude from the workplace all COVID-19 cases and employees excluded under Title 8, Section 3205.1, and we will demonstrate this by meeting the following requirements:

1. COVID-19 cases who do not develop symptoms shall not return to work during the infectious period.
2. COVID-19 cases who develop symptoms shall not return to work during the shorter of the following: The infectious period; or through 10 days after the onset of symptoms and 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.
3. Regardless of vaccination status, previous infection, or lack of COVID-19 symptoms, a COVID-19 case shall wear a face covering in the workplace until 10 days have passed since the date that COVID-19 symptoms began or, if the person did not have COVID-19 symptoms, from the date of their first positive COVID-19 test.
4. The requirements of Title 8, Section 3205 (c)(5)(A)1. and (C)(5)(A)2. apply regardless of whether an employee has previously been excluded or other precautions were taken in response to an employee's close contact or membership in an exposed group.

City of Lindsay will review current California Department of Public Health (CDPH) guidance for persons who had close contacts, including any guidance regarding quarantine or other measures to reduce transmission.

Employees who had potential COVID-19 exposure in our workplace will be:

- Informed of their possible exposure to COVID-19 in the workplace while maintaining confidentiality
- Offered COVID-19 testing through their health provider or if not covered by insurance offered testing through another provider at no cost during their working hours
- Provided information on benefits as outlined in the Training and Instruction section

## **Notice of COVID-19 Cases**

City of Lindsay will notify employees and independent contractors who had a close contact, as well as any employer with an employee who has a close contact. Notice shall be provided as soon as possible, and in no case longer than the time required to ensure the exclusion requirements of Title 8, Section 3205 (c)(5)(A) are met.

When Labor Code Section 6409.6 or any successor law is in effect, City of Lindsay will provide notice of a COVID-19 case in a form readily understandable to employees. Notice shall be given to all employees, employers, and independent contractors at the worksite in accordance with applicable law. Notice shall also be provided to the authorized representative, if any, of the COVID-19 case and of any employee who has a close contact.

## **Face Coverings**

Each entity is advised to check with their local health department and follow whichever orders are the most stringent.

We will provide face coverings and ensure they are worn where required by orders or regulations from the CDPH.

When employees are required to wear face coverings under Section 3205 or Sections 3205.1 through 3205.3, the following exceptions apply:

- a. When an employee is alone in a room or vehicle.
- b. While eating or drinking at the workplace, provided employees are at least six feet apart and, if indoors, the supply of outside or filtered air has been maximized to the extent feasible.
- c. While employees are wearing respirators required by the employer in compliance with Section 5144.
- d. 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. Such employees shall wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom if the condition of disability permits it.
- e. During specific tasks that cannot feasibly be performed with a face covering. This exception is limited to the time period in which such tasks are actually being performed.

## **Respirators**

Upon request, respirators will be provided for voluntary use in compliance with Section 5144 (c) (2) to all employees who are working indoors or in vehicles with more than one person. Whenever respirators are made available for voluntary use, their use shall be encouraged, and employees will be provided with a respirator of the correct size and employees will be trained how to properly wear the respirators provided; how to perform seal checks according to the manufacturer's instruction each time a respirator is worn; and the fact that facial hair interferes with a seal.

## **Ventilation**

For workplaces, City of Lindsay will review CDPH and Cal/OSHA guidance regarding ventilation, including “Interim Guidance for Ventilation, Filtration, and Air Quality in Indoor Environments.” We will develop, implement, and maintain effective methods to prevent transmission of COVID-19 including one or more of the following actions to improve ventilation:

1. Maximize the supply of outside air to the extent feasible, except when the United States Environmental Protection Agency (EPA) Air Quality Index is greater than 100 for any pollutant or if opening windows or maximizing outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.
2. In buildings and structures with mechanical ventilation, filter circulated air through filters at least as protective as Minimum Efficiency Reporting Value (MERV)-13, or the highest level of filtration efficiency compatible with the existing mechanical ventilation system.
3. Use High Efficiency Particulate Air (HEPA) filtration units in accordance with manufacturer’s recommendations in indoor areas occupied by employees for extended periods, where ventilation is inadequate to reduce the risk of COVID-19 transmission.

In vehicles, we will maximize the supply of outdoor air to the extent feasible, except when doing so would cause a hazard to employees or expose them to inclement weather.

During outbreaks, we will continue to comply with ventilation requirements of Subsection 3205.1(f) even after the outbreak has passed and Section 3205.1 is no longer applicable.

## **Aerosolizing Procedures**

For employees in work settings that are exempt from Section 5199 (Aerosol Transmissible Disease Standard) in accordance with the conditions in subsections 5199(a)(2)(A) or (a)(2)(B), who are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids, City of Lindsay will evaluate the need for respiratory protection to prevent COVID-19 transmission under Section 5144 and shall comply with that section.

## **Reporting and Record Keeping**

It is our policy to:

- Keep a record of and track all COVID-19 cases with the employee’s name, contact information, occupation, location where the employee worked, the date of the last day at the workplace, and the date of the positive COVID-19 test and/or COVID-19 diagnosis. These records shall be maintained for two years beyond the period in which the record is necessary to meet the requirements of Section 3205 or Sections 3205.1 through 3205.3.
- We will retain the notices required by Subsection 3205(e) in accordance with Labor Code Section 6409.6 or any successor law.
- Personal identifying information of COVID-19 cases or persons with COVID-19 symptoms, and any employee medical records required by Section 3205 or by Sections 3205.1 through 3205.3, shall be kept confidential unless disclosure is required or permitted by

law. Unredacted information on COVID-19 cases shall be provided to the local health department with jurisdiction over the workplace, CDPH, Cal/OSHA, and the National Institute for Occupational Safety & Health (NIOSH) immediately upon request and when required by law.

**Training and Instruction**

We will provide effective COVID-19 training and instruction that is in accordance with subsection 3203(a)(7) (i.e. Injury and Illness Prevention Program). Appendix D: COVID-19 Training Roster will be used to document this training. If an order to isolate, quarantine, or exclude an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period shall be in accordance with the return to work period(s) listed in the return-to-work criteria in this program.

Joe Tanner

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City Manager

*Joe Tanner*

Joe Tanner (Feb 13, 2023 20:12 PST)

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Signature

Feb 13, 2023

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Date

## **Appendices**



**Appendix A: Identification of COVID-19 Hazards**

All persons regardless of symptoms or negative COVID-19 test results will be considered potentially infectious. Particular attention will be paid to areas where people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not. For example: meetings, entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

Evaluation of potential workplace exposure will be to all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

**Person conducting the evaluation:** [Enter Name\(s\)](#)

**Date:** [Enter Date](#)

**Name(s) of employee and authorized employee representative that participated:** [Enter Name\(s\)](#)

Interaction, area, activity, work task, process, equipment, and material that potentially exposes employees to COVID-19 hazards	Places and times	Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers	Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation

## Appendix B: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 testing or related medical services provided by us will be provided in a manner that ensures the confidentiality of employees, with the exception of unredacted information on COVID-19 cases that will be provided immediately upon request to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law.

All employees' medical records will also be kept confidential and not disclosed or reported without the employee's express written consent to any person within or outside the workplace, with the following exceptions: (1) Unredacted medical records provided to the local health department, CDPH, Cal/OSHA, NIOSH, or as otherwise required by law immediately upon request; and (2) Records that do not contain individually identifiable medical information or from which individually identifiable medical information has been removed.

**Date:** [Enter date](#)

**Name of person conducting the investigation:** [Enter name\(s\)](#)

COVID-19 Case Investigation Information			
Employee (or non-employee*) name:		Occupation (if non-employee, why they were in the workplace):	
Location where employee worked (or non-employee was present in the workplace):		Date investigation was initiated:	
Was COVID-19 test offered?		Name(s) of staff involved in the investigation:	
Date and time the COVID-19 case was last present in the workplace:		Date of the positive or negative test and/or diagnosis:	
Date the case first had one or more COVID-19 symptoms:		Information received regarding COVID-19 test results and onset of symptoms (attach documentation):	
Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period and who may have been exposed (attach additional information):			

<b>Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:</b>			
All employees who may have had a close contact (i.e., shared airspace) with a COVID-19 case and their authorized representatives.	Date:		
	Names of employees that were notified:		
Independent contractors and other employers present at the workplace during the high-risk exposure period.	Date:		
	Names of individuals that were notified:		
What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?		What could be done to reduce exposure to COVID-19?	
Was local health department notified?		Date:	

\*Should an employer be made aware of a non-employee infection source COVID-19 status.



**Appendix D: COVID-19 Training Roster**

**Date:** [Enter date](#)

**Person that conducted the training:** [Enter name\(s\)](#)

Employee Name	Signature

## Appendix E: Definitions

Close Contact	<p>Close contact means the following, unless otherwise defined by regulation or order of the California Department of Public Health (CDPH), in which case the CDPH definition shall apply:</p> <ol style="list-style-type: none"> <li>1) In indoor spaces of 400,000 or fewer cubic feet per floor, a close contact is defined as sharing the same indoor spaces as a COVID-19 case for a cumulative total of 15 minutes or more over a 24-hour period during the COVID-19 case's infectious period, as defined by this section, regardless of the use of face coverings.</li> <li>2) In indoor spaces of greater than 400,000 cubic feet per floor, a close contact is defined as being within six feet of the COVID-19 case for a cumulative total of 15 minutes or more over a 24-hour period during the COVID-19 case's infectious period, as defined by this section, regardless of the use of face coverings.</li> <li>3) Offices, suites, rooms, waiting areas, break or eating areas, bathrooms, or other spaces that are separated by floor-to-ceiling walls shall be considered distinct indoor spaces.</li> </ol>
COVID-19	Coronavirus disease, an infectious disease caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2)
COVID-19 Case	<p>A person who:</p> <ol style="list-style-type: none"> <li>(1) Has a positive "COVID-19 test"; or</li> <li>(2) Has a positive COVID-19 diagnosis from a licensed health care provider; or</li> <li>(3) Is subject to COVID-19-related order to isolate issued by a local or state health official; or</li> <li>(4) Has died due to COVID-19, in determination of a local health department or per inclusion in the COVID-19 statistics of a county.</li> </ol>
COVID-19 Hazard	Exposure to potentially infectious material that may contain SARS-CoV-2, the virus that causes COVID-19. Potentially infectious materials include airborne droplets, small particle aerosols, and airborne droplet nuclei, which most commonly result from a person or persons exhaling, talking or vocalizing, coughing or sneezing, or from procedures performed on a person that may aerosolize saliva or respiratory tract fluids.
COVID-19 Symptoms	Fever of 100.4 degrees Fahrenheit or higher, chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, congestion or runny nose, nausea or vomiting, or diarrhea, unless a licensed health care professional determines the person's symptoms were caused by a known condition other than COVID-19.

<p>COVID-19 Test</p>	<p>A test for SARS-CoV-2 that is:</p> <ul style="list-style-type: none"> <li>(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); and</li> <li>(2) Administered in accordance with the authorized instructions;</li> <li>(3) To meet the return to work criteria set forth in Section 3205 subsection (c)(10), a COVID-19 test may be both self-administered and self-read only if another means of independent verification of the results can be provided (e.g., a time-stamped photograph of the results)</li> </ul>
<p>Exposed Group</p>	<p>All employees at a work location, working area, or a common area at work, within employer-provided transportation covered by Section 3205.3 or residing within housing covered by Section 3502.2 where an employee COVID-19 case was present at any time during the infectious period. A common area at work includes bathrooms, walkways, hallways, aisles, break or eating areas, and waiting areas. The following exceptions apply:</p> <ul style="list-style-type: none"> <li>A) For the purpose of determining the exposed group, a place where persons momentarily pass through, without congregating, is not a work location, working area, or a common area at work.</li> <li>B) If the COVID-19 case was part of a distinct group of employees who are not present at the workplace at the same time as other employees, for instance a work crew or shift that does not overlap with another work crew or shift, only employees within that distinct group are part of the exposed group.</li> <li>C) If the COVID-19 case visited a work location, working area, or a common area at work for less than 15 minutes during the infectious period, and all persons were wearing face coverings at the time the COVID-19 case was present, other people at the work location, working area, or common area are not part of the exposed group.</li> </ul> <p>NOTE: An exposed group may include the employees of more than one employer. See Labor Code sections 6303 and 64304.1.</p>
<p>Face Covering</p>	<p>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 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.</p> <p>This definition includes clear face coverings or cloth face coverings with a clear plastic panel that otherwise meet this definition and that 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.</p>

<p>Infectious Period</p>	<p>Infectious period means the following time period, unless otherwise defined by CDPH regulation or order, in which case the CDPH definition shall apply:</p> <p>(A) For COVID-19 cases who develop symptoms, from two days before the date of symptom onset until:</p> <ul style="list-style-type: none"> <li>(1) Ten days have passed after symptoms first appeared, or through day five if testing negative on day five or later; and</li> <li>(2) Twenty-four hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved.</li> </ul> <p>(B) For COVID-19 cases who never develop symptoms, from two days before the positive specimen collection date through 10 days (or through day five if testing negative on day five or later) after the date on which the specimen for their first positive test for COVID-19 was collected.</p>
<p>Respirator</p>	<p>A respiratory protection device approved by the NIOSH to protect the wearer from particulate matters, such as an N95 filtering facepiece respirator.</p>
<p>Returned Case</p>	<p>A COVID-19 case who was excluded from work but returned pursuant to Section 3205 subsection 3205(c)(5)(A) and did not develop any COVID-19 symptoms after returning. A person shall only be considered a returned case for <del>90</del> 30 days after the initial onset of COVID-19 symptoms or, if the person never developed COVID-19 symptoms, for <del>90</del> 30 days after the first positive test. If a period of other than <del>90</del> 30 days is required by a CDPH regulation or order, that period shall apply.</p>
<p>Worksite</p>	<p>For the limited purposes of section 3205 and 3205.1 is a building, store, facility, agricultural field, or other location where a COVID-19 case was present during the infectious period. It does not apply to buildings, floors, or other locations of the employer that a COVID-19 case did not enter.</p>



## **Additional Considerations**

## **Additional Consideration #1 COVID-19 Outbreaks**

This section of the CPP will stay in effect until there are one or fewer COVID-19 cases detected in our workplace for a 14-day period.

### **COVID-19 testing**

- Immediately upon being covered by Section 3205.1, we will make COVID-19 testing available at no cost to all employees within the exposed group, regardless of vaccination status, during employee's paid time, except for returned cases and employees who were not present at the workplace during the relevant 14-day period(s) under Subsection 3205.1(a).
- City of Lindsay will make testing available on a weekly basis to all employees in the exposed group who remain at the workplace.
- Employees who had close contacts shall have a negative COVID-19 test taken within three to five days after the close contact or shall be excluded and follow the return to work requirements of Subsection 3205(c)(5) starting from the date of the last known close contact.

All employees in the exposed group regardless of vaccination status shall wear face coverings when indoors or when outdoors and less than six feet from another person, unless one of the exceptions in Subsection 3205(f)(2) applies.

Notice shall be given to employees in the exposed group of their right to request a respirator for voluntary use under Subsection 3205(g).

### **COVID-19 investigation, review and hazard correction**

We will perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19 when this section initially applies and periodically thereafter.

The investigation, review, and changes will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
  - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
  - Our COVID-19 testing policies.
  - Insufficient supply of outdoor air to indoor workplaces.
  - Insufficient air filtration.
  - Insufficient physical distancing.
- Updating the review:
  - Every thirty days that the outbreak continues.
  - In response to new information or to new or previously unrecognized COVID-19 hazards.
  - When otherwise necessary.

- Any changes implemented to reduce the transmission of COVID-19 based on the investigation and review, which may include moving indoor tasks outdoors or having them performed remotely; increasing the outdoor air supply when work is done indoors; improving air filtration; increasing physical distancing to the extent feasible; requiring respiratory protection in compliance with Section 5144; and other applicable controls.

Describe other applicable controls.

In buildings or structures with mechanical ventilation, we will filter recirculated air with minimum efficiency reporting value (MERV) 13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, we will use filters with the highest compatible filtering efficiency. We will use High Efficiency Particulate Air (HEPA) air filtration units in accordance with manufacturers' recommendation in indoor areas occupied by employees for extended periods where ventilation is inadequate to reduce the risk of COVID-19 transmission.

### **Major Outbreaks**

If 20 or more employee COVID-19 cases in an exposed group, as defined by Subsection 3205(b)(7), visited the worksite during their infectious period within a 30-day period, we will do the following while Section 3205.1 applies:

- The COVID-19 testing described in Subsection 3205.1(b) shall be required of all employees in the exposed group regardless of vaccination status twice a week or more frequently if recommended by the local health department with jurisdiction over the workplace. Employees in the exposed group shall be tested or shall be excluded and follow return to work requirements of Subsection 3205(c) (5).
- We will report the outbreak to Cal/OSHA. This section does not limit our obligation to report employee deaths, serious injuries, or serious illnesses when required by Subsection 342(a).
- We will provide respirators for voluntary use in compliance with Subsection 5144(c)(2) to employees in the exposed group and will encourage their use and will train employees provided respirators for voluntary use, as required by Subsection 3205(g).
- Any employees in the exposed group who are not wearing respirators required by Enter Name of Entity and used in compliance with Section 5144 shall be separated from other persons by at least six feet, except where we can demonstrate that at least six feet of separation is not feasible and except for momentary exposure while persons are in movement. Methods of physical distancing include telework or other remote work arrangements; reducing the number of persons in an area at one time; including visitors; visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel; staggered arrival, departure, work, and break times; and adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees. When it is not feasible

to maintain a distance of at least six feet, individuals shall be as far apart as feasible.

## **Additional Consideration #2 COVID-19 Prevention in Employer-Provided Housing**

### **Ventilation**

In housing units, employers shall maximize the quantity and supply of outdoor air and increase filtration efficiency to the highest level compatible with the existing ventilation system. If there is not a Minimum Efficiency Reporting Value (MERV) 13 or higher filter in use, portable or mounted high efficiency particulate air (HEPA) filtration units shall be used, to the extent feasible, in all sleeping areas.

### **Face coverings**

We will provide face coverings to all residents and provide information to residents on when they should be used in accordance with state or local health department orders or.

### **Reporting Symptoms**

We will encourage residents to report COVID-19 symptoms to their direct supervisor, who will report to Risk Manager.

### **COVID-19 testing**

We will establish, implement, and maintain effective policies and procedures for COVID-19 testing of residents who had a close contact or COVID-19 symptoms. These policies will be communicated to the residents.

### **Isolation of COVID-19 cases and close contacts**

We will:

- Effectively isolate COVID-19 cases from all residents who are not COVID-19 cases, for the period established by subsection 3205(c)(5)(A). Effective isolation shall include housing COVID-19 cases only with other COVID-19 cases, and providing COVID-19 case residents with a sleeping area and bathroom that is not shared by non-COVID-19 case residents.
- Effectively quarantine residents who have had a close contact from all other residents, in accordance with subsection 3205(c)(5)(B). Effective quarantine shall include providing residents who had a close contact with a private bathroom and sleeping area.

**Additional Consideration #4****COVID-19 Prevention in Employer-Provided Transportation to and From Work**

We will comply with the requirements of Section 3205 within a vehicle, and we will respond to a COVID-19 case within the vehicle in accordance with the requirements of that section.

**Assignment of transportation**

To the extent feasible, we will assign transportation such that cohorts travel and work together, separate from other workers. To the extent feasible, employees who usually maintain a household together shall travel together.

# 2023-01-28 Covid-19 Prevention Policy (CPP)

Final Audit Report

2023-02-14

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