COVID-19 Prevention Procedures (CPP)
The Claremont Colleges (TCCS)

This CPP is designed to control employees’ exposures to the SARS-CoV-2 virus (severe acute respiratory syndrome coronavirus 2) that causes COVID-19 (Coronavirus Disease 2019) that may occur in our workplace.

Date: 05/10/2023

Authority and Responsibility

Amy Mendez, Environmental and Risk Manager and Cristina Irwin, Environmental Health and Safety Specialist have overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all 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 procedures 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.

Application of The Claremont Colleges (TCCS) Injury & Illness Prevention Program (IIPP)

COVID-19 is a recognized hazard in our workplace that is addressed through our IIPP, which will be effectively implemented and maintained to ensure the following:

1. When determining measures to prevent COVID-19 transmission and identifying and correcting COVID-19 hazards in our workplace:
   a. All persons in our workplace are treated as potentially infectious, regardless of symptoms, vaccination status, or negative COVID-19 test results.
   b. COVID-19 is treated as an airborne infectious disease. Applicable State of California and California Department of Public Health orders and guidance will be reviewed when determining measures to prevent transmission and identifying and correcting COVID-19 hazards. COVID-19 prevention controls include:
      i. Remote work.
      ii. Physical distancing.
      iii. Reducing population density indoors.
      iv. Moving indoor tasks outside.
      v. Implementing separate shifts and/or break times.
      vi. Restricting access to work areas.
      vii. Use of mechanical ventilation.
2. Training and instruction on COVID-19 prevention is provided:
   a. When this CPP was first established.
   b. To new employees.
   c. To employees given a new job assignment involving COVID-19 hazards and they have not been previously trained.
   d. Whenever new COVID-19 hazards are introduced.
   e. When we are made aware of new or previously unrecognized COVID-19 hazards.

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f. For supervisors to familiarize themselves with the COVID-19 hazards to which employees under their immediate direction and control may be exposed.

Appendix A COVID-19 Training Roster will be used to document this training or a similar Training Roster.

3. Procedures to investigate COVID-19 illnesses at the workplace include:

   a. Determining the day and time a COVID-19 case was last present; the date of the positive COVID-19 tests or diagnosis; and the date the COVID-19 case first had one or more COVID-19 symptoms. Appendix B Investigating COVID-19 Cases will be used to document this information or similar document.

   b. Effectively identifying and responding to persons with COVID-19 symptoms at the workplace. The TCCS Daily Health Screening form may be used to identify employees who exhibit symptoms of Covid-19 and may be accessed through the TCCS website. [Link](https://cuc.formstack.com/forms/covid19_self_report_health_screening)

   c. Encouraging employees to report COVID-19 symptoms and to stay home when ill. All employees are encouraged to use the TCCS Daily Health Screening form to report symptoms of Covid-19. The TCCS Daily Health Screening form is forwarded to the Contact Tracing Team who will notify their supervisor. Employees may also contact their supervisor if they begin to exhibit Covid-19 symptoms.

4. Effective procedures for responding to COVID-19 cases at the workplace include:

   a. Immediately excluding COVID-19 cases (including employees excluded under CCR, Title 8, section 3205.1) according to the following requirements:

      i. COVID-19 cases who do not develop COVID-19 symptoms will not return to work during the infectious period.

      ii. COVID-19 cases who develop COVID-19 symptoms will not return to work during the shorter of either of the following:

         a. The infectious period.

         b. 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 medication.

      iii. Regardless of vaccination status, previous infection, or lack of COVID-19 symptoms, a COVID-19 case must 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.

      iv. Elements i. and ii. apply regardless of whether an employee has been previously excluded or other precautions were taken in response to an employee’s close contact or membership in an exposed group.

   b. Reviewing County of Los Angeles Public Health Department guidance for persons who had close contacts, including any guidance regarding quarantine or other measures to reduce transmission.

   c. The following effective policies will be developed, implemented, and maintained to prevent transmission of COVID-19 by persons who had close contacts.

      • Encourage employees who are sick or exhibit symptoms of Covid-19 to stay home.

      • Provide access to free Covid-19 testing via vending machines located throughout the seven college campuses.

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• Provide free N95 masks upon request and encourage the use of face coverings inside buildings.  https://cuc.formstack.com/forms/n95_respirator_request_form

• Use signs to remind employees to maintain 6 ft. distance.

• Use physical barriers, room filtration devices and mechanical ventilation when 6 ft. distance is not possible.

• Ensure all common areas are cleaned daily and hand wash stations are fully stocked with soap, paper towels and hot water.

• Encourage employees to wash their hands frequently for at least 20 seconds and provide hand sanitizer, disinfectant aerosols and disinfectant wipes upon request.

• Continue to provide telework for employees whose work may be performed at home.

• Encourage Zoom and Microsoft Teams meetings in place of in person gatherings.

• Provide access to large conference rooms and outdoor areas when in-person employee gatherings are needed.

• Provide access to online training.

d. 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.

e. If removal of an employee would create undue risk to a community’s health, The Claremont Colleges (TCCS) may submit a request for a waiver to Cal/OSHA in writing to rs@dir.ca.gov to allow employees to return to work if it does not violate local or state health official orders for isolation, quarantine, or exclusion. All employees who exhibit symptoms of Covid-19 are encouraged to stay home. Any employee who wishes to work while exhibiting symptoms of Covid-19 or who have a positive Covid-19 test result are encouraged to work remotely. For employees whose position does not make it possible to work remotely, they are encouraged to use their sick time or Covid-19 time. Employees may consult the County of Los Angeles Public Health Department Isolation Instructions before returning to work and may request N95 masks from EH&S Department.

f. Upon excluding an employee from the workplace based on COVID-19 or a close contact, The Claremont Colleges (TCCS) will provide excluded employees information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws. This includes any benefits available under legally mandated sick leave, workers' compensation law, local governmental requirements, and The Claremont Colleges (TCCS) leave policies and leave guaranteed by contract. Employees may visit the TCCS Covid-19 website for all of the latest updates and Covid-19 news.

https://services.claremont.edu/covid/

Testing of Close Contacts

COVID-19 tests are available at no cost, during paid time, to all of our employees who had a close contact in the workplace. These employees will be provided with the information outlined in paragraph (4)(f), above.
Exceptions are returned cases as defined in CCR, Title 8, section 3205(b)(11).

**Notice of COVID-19 Cases**

Employees and independent contractors who had a close contact, as well as any employer with an employee who had a close contact, will be notified as soon as possible, and in no case longer than the time required to ensure that the exclusion requirements of paragraph (4)(a) above, are met.

When Labor Code section 6409.6 or any successor law is in effect, The Claremont Colleges (TCCS) will:
- Provide notice of a COVID-19 case, in a form readily understandable to employees. The notice will be given to all employees, employers, and independent contractors at the worksite.
- Provide the notice to the authorized representative if any of:
  - The COVID-19 case and of any employee who had close contact.
  - All employees on the premises at the same worksite as the COVID-19 case within the infectious period.

All employees who exhibit symptoms of Covid-19 or who have recently come into contact with someone with Covid-19 are encouraged to use one of the Covid-19 testing vending machines located throughout the seven Colleges. In the event of a positive Covid-19 result, they will be contacted via email or by someone from the Contact Tracing Team and given instructions on how to proceed.

**Face Coverings**

Employees will be provided face coverings and required to wear them:
- When required by orders from the CDPH. This includes spaces within vehicles when a CDPH regulation or order requires face coverings indoors.
- During outbreaks and major outbreaks.
- When employees return to work after having COVID-19 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, or after a close contact. Please refer to the section in this FAQ on CDPH's Isolation and Quarantine Guidance.

Face coverings will be clean, undamaged, and worn over the nose and mouth.

The following exceptions apply:

1. When an employee is alone in a room or vehicle.
2. 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.
3. While employees are wearing respirators required by the employer and used in compliance with CCR, Title 8 section 5144.
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. Such employees shall wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if the condition or disability permits it.
5. During 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.

If an employee is not wearing a face covering due to exceptions (4) and (5), above, the COVID-19 hazards will be assessed, and action taken as necessary.

Employees will not be prevented from wearing a face covering, including a respirator, when not required by this section, unless it creates a safety hazard.

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Respirators

Respirators will be provided for voluntary use to employees who request them and who are working indoors or in vehicles with more than one person. Employees who request respirators for voluntary use will be:

- Encouraged to use them.
- Provided with a respirator of the correct size.
- Trained on:
  - How to properly wear the respirator provided.
  - How to perform a user seal check according to the manufacturer’s instructions each time a respirator is worn.
  - The fact that facial hair interferes with a seal.

The requirements of CCR, Title 8 section 5144(c)(2) will be complied with according to the type of respirator (disposable filtering face piece or elastomeric re-usable) provided to employees.

Ventilation

For our indoor workplaces we will:

- Review CDPH and Cal/OSHA guidance regarding ventilation, including the CDPH Interim Guidance for Ventilation, Filtration, and Air Quality in Indoor Environments. The Claremont Colleges (TCCS) will develop, implement, and maintain effective methods to prevent transmission of COVID-19, including one or more of the following actions to improve ventilation:
  - 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.
  - 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.
  - Use High Efficiency Particulate Air (HEPA) filtration units in accordance with manufacturers’ recommendations in indoor areas occupied by employees for extended periods, where ventilation is inadequate to reduce the risk of COVID-19 transmission.

- Determine if our workplace is subject to CCR, Title 8 section 5142 Mechanically Driven Heating, Ventilating and Air Conditioning (HVAC) Systems to Provide Minimum Building Ventilation, or section 5143 General Requirements of Mechanical Ventilation Systems, and comply as required.

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

Aerosolizing Procedures

We have work settings that are exempt from CCR, Title 8 section 5199 requirements and some employees engage in the following procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids: Employees who provide emergency first aid must follow the TCCS Aerosolizing Procedures (Ex. Student Health Services employees and Campus Safety employees).

The need for respiratory protection to prevent COVID-19 transmission during these procedures has been evaluated, and the determination made that respirators shall be provided by the employer when such equipment is necessary to protect the health of the employee. The employer shall provide respirators which

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are applicable and suitable for the purpose intended. An air-purifying respirator with an air-purifying filter, cartridge, or canister that removes specific air contaminants by passing ambient air through the air-purifying element shall be provided to when necessary to protect the health of the employee.

**Reporting and Recordkeeping**

Appendix B *Investigating COVID-19 Cases* will be used to keep a record of and track all COVID-19 cases. These records will be kept by The Contact Tracing Team and retained for two years beyond the period in which it is necessary to meet the requirements of CCR, Title 8, sections 3205, 3205.1, 3205.2, and 3205.3. The notices required by subsection 3205(e) will be kept in accordance with Labor Code section 6409.6 or any successor law.
## Appendix A: COVID-19 Training Roster

**Date Training Completed:**

**Trainer:**

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<th>Employee Name</th>
<th>Signature</th>
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Appendix B: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or persons with COVID-19 symptoms, and any employee required medical records will be kept confidential unless disclosure is required or permitted by law. Unredacted information on COVID-19 cases will be provided to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH) immediately upon request, and when required by law.

Date COVID-19 Case (Suspect or Confirmed) Became Known:

Date Investigation was Initiated:

Name of Person(s) Conducting the Investigation:

COVID-19 Case Summary

<table>
<thead>
<tr>
<th>Name</th>
<th>Contact Info</th>
<th>Occupation</th>
<th>Location</th>
<th>Last day and time present</th>
<th>Date of positive test and/or diagnosis</th>
<th>Date of first symptoms</th>
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Summary of employees, independent contractors, and employees of other employers that came in close contact CCR Title 8, section 3205 does not require recordkeeping for close contacts. These tables are included to assist employers in keeping track of which close contacts they have notified to meet the notice requirements.

<table>
<thead>
<tr>
<th>Name</th>
<th>Contact Info</th>
<th>Date notified</th>
<th>Date offered COVID-19 testing (employees only)</th>
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Summary notice of a COVID-19 case (employees, employers, independent contractors) – during the infectious period and regardless of close contact occurring.

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<th>Name</th>
<th>Date notified</th>
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Summary notice of a COVID-19 case (authorized representative of the COVID-19 case and employee who had close contact).
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 the local health department notified? Date?
Additional Consideration #1

COVID-19 Outbreaks

This addendum will need to be added to your CPP if three or more employee COVID-19 cases within an exposed group visited the workplace during their infectious period at any time during 14-day period, unless a CDPH regulation or order defines outbreak using a different number of COVID-19 cases and/or a different time period. Reference CCR, Title 8 section 3205.1 for details.

This addendum will stay in effect until there are one or fewer new COVID-19 cases detected in the exposed group for a 14-day period.

COVID-19 Testing

We immediately provide COVID-19 testing available at no cost to our employees within the exposed group, regardless of vaccination status, during employees’ paid time, except for returned cases and employees who were not present at the workplace during the relevant 14-day period(s).

Additional testing is made available on a weekly basis to all employees in the exposed group who remain at the workplace.

Employees who had close contacts will have a negative COVID-19 test taken within three to five days after the close contact or will be excluded and follow our return-to-work requirements starting from the date of the last known close contact.

Face Coverings

Employees in the exposed group, regardless of vaccination status, will wear face coverings when indoors, or when outdoors and less than six feet from another person, unless one of the exceptions in our CPP applies.

Respirators

Employees will be notified of their right to request and receive a respirator for voluntary use, as stipulated in our CPP.

COVID-19 Investigation, Review, and Hazard Correction

The Claremont Colleges (TCCS) 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 addendum 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.
- Review updated every 30 days that CCR, Title 8 section 3205.1 continues to apply:
  - 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 CCR, Title 8 section 5144.
Other applicable controls.

**Ventilation**

Buildings or structures with mechanical ventilation will have recirculated air filtered 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, filters with the highest compatible filtering efficiency will be used. High Efficiency Particulate Air (HEPA) air filtration units will be used in accordance with manufacturers’ recommendations in indoor areas occupied by employees for extended periods, where ventilation is inadequate to reduce the risk of COVID-19 transmission.

These ventilation requirements will continue to be implemented after the outbreak has passed and CCR, Title 8 section 3205.1 is no longer applicable.

**Major Outbreaks**

The following will be done while CCR, Title 8 section 3205.1 applies if 20 or more employee COVID-19 cases in an exposed group visited the worksite during their infectious period within a 30-day period:

- The COVID-19 testing will be required of all employees in the exposed group, regardless of vaccination status, twice a week or more frequently if recommended by County of Los Angeles Public Health Department. Employees in the exposed group will be tested or excluded and follow our CPP return to work requirements. The twice a week testing requirement ends when there are fewer than three new COVID-19 cases in the exposed group for a 14-day period. We will then follow weekly testing requirement until there are one or fewer new COVID-19 cases in the exposed group for a 14-day period.
- Report the outbreak to Cal/OSHA.
- Provide respirators for voluntary use to employees in the exposed group, encourage their use, and train employees according to CCR, Title 8 section 5144(c)(2) requirements.
- Any employees in the exposed group who are not wearing respirators as required will be separated from other persons by at least six feet, except where it can be demonstrated 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 people 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.
  - 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 will be as far apart as feasible.
Additional Consideration #3

COVID-19 Prevention in Employer-Provided Transportation

This addendum will need to be added to your CPP if there is employer-provided motor vehicle transportation to and from work, during the course and scope of employment, which is provided, arranged for, or secured by an employer regardless of the travel distance or duration involved. Reference CCR, Title 8 section 3205.3(a) for details and exceptions.

The requirements of our CPP will be complied with within a vehicle, including how a COVID-19 case will be responded to.

Assignment of transportation

To the extent feasible:
- Transportation will be assigned such that cohorts travel and work together, separate from other workers.
- Employees who usually maintain a household together shall travel together.