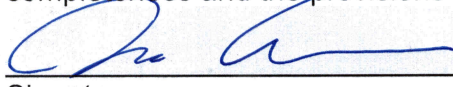# INJURY AND ILLNESS PREVENTION PROGRAM
California COVID-19 Addendum

ADDENDUM OBJECTIVES

A. Satisfy Cal/OSHA regulations that require protection for workers exposed to airborne infectious diseases, such as coronavirus disease (COVID-19).

B. Outline best-practice protocols to follow while Cal/OSHA's Emergency COVID-19 Standard is in effect.

C. Control exposure to the COVID-19 virus that may occur within the workplace.

I have reviewed this Injury and Illness Prevention Program California Addendum for completeness and the provisions contained herein will apply to our operations.

_____   _____
Signature   Title   *Pres.*

MANUEL DEOLIVEIRA   JAN 7, 2021
_____   _____
Printed Name   Date

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Section

RESPONSIBLE PARTIES

To help meet compliance requirements and ensure the success of this program, please indicate who at your organization is assuming ownership of implementing this handbook.

Program Administrator — List the person(s) responsible for implementing this plan.

The Program Administrator has agreed to their commitment to uphold the policies outlined herein. Responsibilities include:
1) Conducting a risk assessment and taking measures to help prevent the spread of the virus.
2) Training and communicating with employees and employee representatives on the plan.
3) Establishing a process to check for compliance and to document and correct deficiencies.
4) Setting up a process to investigate COVID-19 cases, alerting the local health department, identifying and isolating workplace contact of employees suspected to be infected until they are tested.
5) Updating this plan as necessary to prevent further cases.

In addition, all **managers and supervisors** are responsible for implementing and maintaining this program in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

Employee participation will include following all COVID-19 safety rules, engaging in safety committee meetings, inspecting their work areas, enforcing safety practices in the workplace, wearing PPE, and reporting symptoms or observations.

I. SYSTEM FOR COMMUNICATING

Our organization uses email communication, where possible, as well as verbal communication to provide information about COVID-19.

We encourage open and honest communication between leaders and employees and we will not retaliate against those who in good faith report COVID-19 symptoms, possible COVID-19 exposures, or related hazards in the workplace.

Our goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and will include the following information:

- Employees should report COVID-19 symptoms and possible hazards to their supervisor. Ideally, they should report COVID-19 symptoms by calling their supervisor and remain at home.
- Our procedures or policies for accommodating employees with medical or other conditions that increase their risk of severe COVID-19 illness.
- Where testing is not required, how employees can access COVID-19 testing. We want to give employees the tools to get tested when they have symptoms to reduce the likelihood of bringing the virus to work.
- Information about COVID-19 hazards employees may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures.
- See also Employee Participation.

Workplace Exposure Communication

In the event we are required to provide COVID-19 testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test.

If you're required to get a COVID-19 test because of an employee exposure, this will be provided to you at no cost during work hours.

II. IDENTIFICATION & EVALUATION OF COVID-19 HAZARDS

Based on Cal/OSHA specifications, this organization takes the following actions to identify and address COVID-19 hazards in the workplace:

- Conducts workplace-specific evaluations, including assessing the effectiveness of existing COVID-19 prevention controls and the need for different or additional controls, using **Appendix A: Identification of COVID-19 Hazards**.
- Assesses employees' potential workplace COVID-19 exposures to people at work, including visitors.
- Evaluates existing COVID-19 workplace prevention controls and the need for different or additional controls as the virus spreads.
- Maximizes the quantity of outdoor air exchange for indoor work settings and sets optimal filtration efficiency compatible with our existing ventilation systems.
- Completes periodic inspections using the **Appendix B: COVID-19 Inspections Form** to identify unhealthy conditions.
- Updates COVID-19 policies and procedures as necessary to mitigate workplace hazards.
- Regularly reviews applicable state and local health department orders and guidance and makes necessary adjustments.

Employee Participation

Employees and authorized employee representatives are expected to report COVID-19 noncompliance or concerns to their supervisor. In addition, employees may submit COVID-19 safety suggestions through KPA's Vera Suite software, at Safety Committee Meetings, or similar.

Instructions
1. Go to www.VeraSuite.com. Enter **KPAMSDS** as the username and your KPA client ID/pin as the password. The pin number is on the Safety Data Sheet (SDS) poster.
2. Click on the **Suggestions** tab.
3. Add your idea. **Submit**.

Employee Screening

Our organization's primary method of detecting COVID-19 in the workplace will be self-monitoring.

Employees must stay home and notify their employer if they are experiencing the COVID-19 symptoms below, were diagnosed with COVID-19, or are waiting for COVID-19 test results. They may work from home, if possible, depending on their job duties.

- Fever (100.4+° F)
- Cough
- Shortness of Breath
- Congestion or Runny Nose
- Fatigue
- Sore Throat
- New Loss of Taste or Smell
- Headache
- Muscle or Body Aches
- Nausea or Vomiting
- Diarrhea

Upon arriving at work, employees who appear to have symptoms or who become sick during the day will be immediately separated from others and sent home or referred to a health clinic or a testing location.

III. INVESTIGATING & RESPONDING TO COVID-19 CASES IN THE WORKPLACE

We use **Appendix C: Investigating COVID-19 Cases** whenever there is suspected or confirmed COVID-19 exposure in our workplace.

Employee Notification

Within 1 business day of a potential COVID-19 exposure, we will notify any affected employees. This will be done in writing or in a private, in-person setting. Personal identifying information of COVID-19 cases, employee medical records, and persons with COVID-19 symptoms will be kept confidential.

COVID-19 Testing

If the exposure was part of a workplace COVID-19 outbreak involving 3 or more employees, this individual will also be offered a COVID-19 test at no cost during work hours. Our HR representative will also discuss available benefits.

IV. CORRECTION OF COVID-19 HAZARDS

Unsafe or unhealthy work conditions, practices, or procedures will be documented in **Appendix B: COVID-19 Inspections** and corrected in a timely manner based on the severity of the hazards.

You can also add an inspection item with a corrective action in KPA's Vera Suite (www.VeraSuite.com).

V. TRAINING & INSTRUCTION

As part of our ongoing COVID-19 employee training, we will provide instruction that covers:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which employees may be eligible based on federal, state, or local laws.
- The fact that:
  - COVID-19 is an infectious disease that can be spread through the air.

- COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
  - An infectious person may not have symptoms.
- Methods of physical distancing in the workplace to stay at least 6 feet apart from coworkers and others as much as possible and the importance of combining physical distancing with wearing face coverings.
- The fact that particles containing the virus can travel more than 6 feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using 60% alcohol hand sanitizer when employees don't have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment — face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, the importance of obtaining a COVID-19 test, and not coming to work if the employee has COVID-19 symptoms.
- Additional training and coaching may be purchased through **KPA's COVID-19 Safety Program**.

Appendix D: COVID-19 Training Roster will be used to document COVID-19 training conducted at our locations. Or, use Vera Suite's (www.VeraSuite.com) onsite training feature.

VI. CONTROL OF COVID-19 HAZARDS

PHYSICAL DISTANCING

Where possible, we ensure at least 6 feet of physical distancing at all times in our workplace by:

- Allowing workers in appropriate positions to telework or take advantage of other remote work arrangements.
- Reducing the number of people, including visitors, who are in a given area at any one time.
- Providing visual cues such as signs and floor markings to indicate where employees and others should be located or what their direction or path of travel should be.

- Allowing employees to have staggered arrival, departure, work, and break times.
- Adjusting work processes or procedures, such as reducing production speed, to allow greater distance between employees.
- Keeping individuals as far apart as possible when there are situations where 6 feet of physical distancing cannot be achieved.

When it isn't possible to maintain a distance of at least 6 feet apart, individuals will be as far apart as possible.

Our organization provides clean, undamaged face coverings for employees. Face coverings are primarily disposable surgical/medical masks and are available throughout the facility. They are designed for one-time use, worn for the duration of each shift or work period. Employees will properly remove and discard worn masks as they exit the building or at home.

Supervisors will ensure employees are wearing face coverings properly:

- Over the nose and mouth.
- When indoors.
- When outdoors and less than 6 feet away from another person, including non-employees.
- As required by the California Department of Public Health (CDPH) or local health department orders.

Workplace Facemask Exceptions

Face coverings must be worn the majority of the workday except in the following situations:

- When an employee is alone in a room.
- While eating and drinking at the workplace and other employees are at least 6 feet apart and outside air is being supplied to the area.
- Employees are wearing another form of respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- 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. Alternatives will be considered on a case-by-case basis.

- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least 6 feet apart.

Employees who cannot wear a face mask due to a medical condition, mental health diagnosis, or disability will wear an effective, non-restrictive alternative, such as a face shield with a drape on the bottom, instead.

Any employee not wearing a face covering, face shield, or another effective form of respiratory protection will be at least 6 feet away from other people unless the unmasked employee is tested at least 2x a week for COVID-19.

Replacing Masks

If employees' masks become dirty or compromised, they will go to the area where new masks are stored, disinfect their hands, take off the old mask, disinfect again and apply a new mask.

Public/Visitor Mask Wearing

We have posted signs at our main entrances instructing members of the public and visitors that they must wear masks while they are at our workplace.

As part of protecting employees from people who not wearing masks, we maintain 6-feet physical distancing and will ask the person to comply as outlined below.

De-Escalating Non-Mask Wearers

If employees encounter non-employees who aren't wearing a face covering, they will remind the person that for their safety and state/regional/local compliance everyone on the premises must wear a mask. If the non-employee refuses to comply, the employee may offer the person a complimentary mask, ask the person to leave, or contact authorities as a last resort.

Employees are not expected to enforce mask covering requirements for non-employees. Their role is limited to requesting and encouraging compliance with our organization's policy and doing their best to de-escalate the situation.

VII. OTHER ENGINEERING CONTROLS, ADMINISTRATIVE CONTROLS & PERSONAL PROTECTIVE EQUIPMENT

We implement the following measures for situations where we cannot maintain at least 6 feet between individuals:

- Cleanable, plastic partitions will be installed by customer interaction areas.
- We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems.
- Our ventilation system will be properly maintained and adjusted with professional tune-ups completed at least twice a year.

Cleaning & Disinfecting

We use products approved for use against COVID-19 on the U.S. Environmental Protection Agency (EPA) approved list. We also implement the following cleaning and disinfection measures for frequently touched surfaces:

	Location	Items	Approach	Frequency
1	Workstations	Tools, machinery buttons	Spray disinfectant or wipe down	End of each shift
2	Offices, Conference Rooms	Table, desk, chair(s)	Spray disinfectant or wipe down	End of workday
3	General Objects	Doors and windows, handles, faucets, sinks, bathrooms, touchscreens	Spray disinfectant or wipe down	4 x per day
4	Break Room(s), Locker Room(s)	Tables, chairs, refrigerator, appliances, benches, lockers	Spray disinfectant or wipe down	After each use
5	Vending Machines	Buttons and collection areas	Spray disinfectant	Daily
6	Forklifts	All surfaces drivers touch	Spray disinfectant	After each use
7	Multi-user PPE	All surfaces	Spray disinfectant or wipe down	Between use

	Location	Items	Approach	Frequency
8	Company Vehicles	Handles and doors, steering wheels, seat belts, window buttons, radio buttons, turn signals, cup holders	Spray disinfectant	Between use from different drivers or passengers
9	Floors & Walls		Mop or wipe down	Periodic, daily in high touch areas

In addition, we do the following:

- Ensure adequate supplies and adequate time for it to be done properly by designating an individual to take inventory and place orders well ahead of running out of cleaning supplies.
- Inform any outside cleaning services we use to apply EPA-approved COVID-19 disinfectants and wipe down common touch surfaces and objects.

Sick Employees' Spaces

Should we have a COVID-19 case in our workplace, we will implement the following procedures:

- If possible, limit other employees' access to areas where the sick person spent the most time and wait 72 hours to clean them.

- Clean and disinfect **all areas used by the person who is sick**, such as offices, bathrooms, common areas, shared electronic equipment like tablets, touch screens, keyboards, etc.

- If it's been **more than 7 days** since the person who is sick visited or used the facility, additional cleaning and disinfection is probably not necessary.

PERSONAL PROTECTIVE EQUIPMENT (PPE), SHARED TOOLS & EQUIPMENT

We evaluate the need for PPE, such as gloves, goggles, and face shields, as required by CCR Title 8, section 3380, and provide such PPE as needed.

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained.

We provide and ensure use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.
In addition:

- PPE (e.g., gloves, goggles, and face shields) must not be shared.
- Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible.
- Where there must be sharing, the items will be disinfected between uses. The last user will apply an EPA-approved COVID-19 disinfectant.
- Sharing of vehicles will be minimized to the extent feasible, and high-touch points (i.e., steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users.
- If respiratory protection or eye protection are deemed necessary, we will follow applicable state and federal regulations.

VIII. REPORTING, RECORDKEEPING & ACCESS

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law and provide related information as requested by the local health department.
- Report any employee COVID-19-related serious illnesses or deaths immediately to Cal/OSHA in accordance with CCR Title 8 section 330(h).
- Maintain records of the steps taken to implement COVID-19 prevention protocols in accordance with CCR Title 8 section 3203(b).

- Make our written **Injury and Illness Prevention Program** and **this Addendum** available at the workplace to employees, authorized employee representatives, and Cal/OSHA representatives immediately upon request.
- Use **Appendix C: Investigating COVID-19 Cases** to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law. Personal identifying information will be removed.

IX. EXCLUSION OF COVID-19 CASES

If we have a COVID-19 confirmed positive case in our workplace, we will limit transmission by:

- Ensuring that COVID-19 cases/individuals are excluded from the workplace until return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known date of contact with a COVID-19 case.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related.
- Honoring any other applicable laws, employer policies, or collective bargaining agreements that provide greater protections.
- Providing employees information on available benefits at the time of exclusion.

X. RETURN-TO-WORK CRITERIA

Employees with COVID-19 symptoms will not return to work until all of the following have occurred:

- At least 24 hours have passed since having a fever of 100.4° F or higher without using fever-reducing medications.
- COVID-19 symptoms have improved.
- At least 10 days have passed since COVID-19 symptoms first appeared.

Positive Test

Those who tested COVID-19 positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of their first

positive COVID-19 test.

Negative Test

A negative COVID-19 test will not be required for an employee to return to work.

Local or State Health Isolation or Quarantine Order

If a local or state health official orders an employee to isolate or quarantine, the employee will not return to work until the mandated time period is completed or the order is lifted.

If no time period was specified, then the employee won't return to work until 10 days after the isolation order went into effect or 14 days from the time the quarantine order went into effect.

A local health department may allow employees to return to work on the basis that removing them would create undue risk to a community's health and safety. If that's the case, the employer will develop, implement, and maintain effective control measures to prevent transmission in the workplace. Such measures may include isolating the employee at work or respiratory protection in the workplace.

XI. MULTIPLE COVID-19 INFECTIONS & OUTBREAKS

Multiple COVID-19 infections describe a workplace with 3 or more COVID-19 cases in a 14-day period. In these circumstances, we will:

- Provide free and immediate COVID-19 testing during work hours to all employees at the exposed workplace. Employees who weren't present during the outbreak won't be tested.
- Notify the local health department within 48 hours of 3 or more confirmed COVID-19 cases at the workplace as well as any subsequent cases. By law, we are required to report the following information to the local health department: the total number of COVID-19 cases and for each COVID-19 case, the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and North American Industry Classification System code of the workplace of the COVID-19 case.
- Retest applicable employees again 1 week later.
- Provide additional COVID-19 testing at least once per week, or more frequently if recommended by the local health department, for employees who remain at the workplace.

- Exclude COVID-19 cases and employees who were exposed to COVID-19 from the workplace.
- Investigate the COVID-19 workplace outbreak using **Appendix C: Investigating COVID-19 Cases** to determine whether possible workplace related factors contributed to the COVID-19 outbreak.
- Review relevant leave policies, COVID-19 policies, procedures, and controls and implement changes as needed to prevent the further spread of COVID-19. This review will be completed every 30 days that the COVID-19 workplace outbreak continues.

Major COVID-19 outbreaks describe exposed workplaces with 20 or more COVID-19 cases within a 30-day period. In addition to the procedures described above, we will also:

- Provide additional COVID-19 testing at least twice per week.
- Filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters that are compatible with our ventilation system. If the filters are not viable, we will use filters with the highest compatible filtering efficiency.
- Evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems would reduce the risk of transmission and implement their use to the degree feasible.
- Determine the need for a respiratory protection program or changes to an existing respiratory protection program.
- Evaluate whether to halt some or all operations at the workplace until COVID-19 hazards have been corrected.
- Enact any other control measures deemed necessary by state authorities through the Issuance of Order to Take Special Action.

APPENDIX A: IDENTIFICATION OF COVID-19 HAZARDS FORM

Person Conducting the Evaluation: _____ **Date:** _____

Name(s) of employee and authorized employee representative who participated:

Potential Exposure to COVID-19 Hazard (interaction, area, activity, work task, process, equipment, material)	Places & Times	Potential for COVID-19 Exposures & People Affected (the public, employees, vendors, etc.)	Existing or Additional COVID-19 Prevention Controls

APPENDIX B: COVID-19 INSPECTIONS FORM

Person Conducting the Inspection: _____   **Date:** _____

Work Location Evaluated: _____

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/Partitions			
Ventilation			
Additional Room Air Filtration			
[Add items]			
Administrative			
Physical Distancing			
Cleaning & Disinfection			
Hand Washing Facilities			
Disinfecting & Hand Sanitizer Used Per Manufacturer Instructions			
[Add items]			

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
PPE (not shared, available & being worn)			
Face Coverings			
Gloves			
Face Shields/Goggles			
Respiratory Protection			
[Add items]			

APPENDIX C: INVESTIGATING COVID-19 CASES

Person Conducting the Investigation: _____ Date: _____

Employee/Non-employee name with suspected or confirmed COVID-19: *Remember names must be kept confidential	
Location where employee worked (or where non-employee was present in the workplace):	
Was COVID-19 test offered?	
Date and time the COVID-19 case/person was last in the workplace:	
Date the case/person first had one or more COVID-19 symptoms:	
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):	

Notice given (within 1 business day, in a way that does not reveal personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:

All employees who may have had COVID-19 exposure and their authorized representatives.	Date:	
	Names of employees that were notified:	
Independent contractors and other employers present during 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:	

APPENDIX D: COVID-19 TRAINING ROSTER

Topic: _____ Date: _____

Facilitator Name: _____ Company Name: _____

Read Before Signing…

I acknowledge that I have received training on the subject listed above. I understand that this training was only a general overview of the subject and that I should contact my supervisor with any questions or concerns that I have.

Printed Name	Job Title/Description	Signature
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Remember: Upload the training roster to VeraSuite.com!