

COVID-19 Prevention Procedures (CPP) for Mt San Antonio Community College District

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: March 14, 2023

Authority and Responsibility

Mt. San Antonio College COVID-19 Compliance Task Force has 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 Mt San Antonio Community College 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.¹
 - b. COVID-19 is treated as an airborne infectious disease. Applicable State of California and Los Angeles County Department of Public Health and Cal/OSHA orders and guidance will be reviewed when determining measures to prevent transmission and identifying and correcting COVID-19 hazards. COVID-19 prevention controls may include but not limited to:²
 - 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.
2. Training and instruction on COVID-19 prevention is provided:³
 - 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.

¹ 8 CCR §3205(c)(1)

² 8 CCR §3205(c)(2)

³ 8 CCR §3205(c)(3)

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

Documentation of COVID-19 prevention training will be kept by the College's Professional and Organizational Development Department for each employee, including employee name or other identifier, training dates, type(s) of training, and training providers.

3. Procedures to investigate COVID-19 illnesses at the workplace include:⁴

- a. To the extent possible, determining the day and time a COVID-19 case was last present; the date of the positive COVID-19 test(s) or diagnosis; and the date the COVID-19 case first had one or more COVID-19 symptoms (if any were experienced). Appendix A Investigating COVID-19 Cases will be used to document this information.
- b. Encouraging employees and students to report COVID-19 symptoms and to stay home when ill. Employees and students are encouraged to complete the employee or student health check forms when experiencing COVID-19 symptoms. The employee and student health check forms are available on the Mt San Antonio College website at <http://www.mtsac.edu/covid19>.
- c. Effectively identifying and responding to persons with COVID-19 symptoms at the workplace. When the College receives a report of COVID-19 symptoms through the employee or student health check forms, the College's Contact Tracing Department shall respond to the person with COVID-19 symptoms.

d.

4. Effective procedures for responding to COVID-19 cases at the workplace include:⁵

- 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 as defined by California's Department of Public Health (CDPH).
 - 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 period⁶ as defined by CDPH; OR
 - b. 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 medication.
 - iii. Regardless of vaccination status, previous infection, or lack of COVID-19 symptoms, an employee 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

⁴ 8 CCR §3205(c)(4)

⁵ 8 CCR §3205(c)(5)

⁶ As of March 13, 2023, the "Infectious Period" is defined as follows:

- For symptomatic confirmed cases, 2 days before the confirmed case had any symptoms (symptom onset date is Day 0) through Days 5–10 after symptoms first appeared AND 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved.
 - Starting any time after Day 5, the infectious period has ended if the COVID-19 case has no fever for 24 hours and symptoms have improved, with no testing necessary.
 - After Day 10, the infectious period has ended if the COVID-19 case has no fever for 24 hours, whether or not other symptoms are improving, with no testing necessary.
- For asymptomatic confirmed cases, 2 days before the positive specimen collection date (collection date is Day 0) through Day 5 after positive specimen collection date for their first positive COVID-19 test.

The definition of "infectious period" will change if CDPH again changes its definition in a regulation or order.

date of their first positive COVID-19 test, except when eating or drinking. A student COVID-19 case is strongly recommended to continue to wear a highly protective mask around others for 10 days after their positive test or the first full day after their symptoms developed, except when eating or drinking.

- 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 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.
- c. The following effective policies will be developed, implemented, and maintained to prevent transmission of COVID-19 by persons who had close contacts
 - Employees can voluntarily request a N95 respirator to wear while working on campus.
 - There is an online reporting form should an employee develop symptoms.
 - The employee must remain off campus until cleared by contact tracing team.
 - PPE supplies such as masks, hand sanitizers are provided at no cost to employees.
 - Barriers have been placed in high traffic areas high contact areas.
- 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, Mt San Antonio Community College 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. In such cases, Mt. San Antonio College will review the workplace and apply control measures for the employee such as isolation for the employee at the workplace and, if isolation is not feasible, the use of respirators in the workplace to prevent exposure to COVID-19 and transmission.
- f. Upon excluding an employee from the workplace based on COVID-19 or a close contact, Mt. San Antonio College will provide excluded employees written information to their employee email address 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 Mt San Antonio College's leave policies and leave guaranteed by contract.

Testing of Close Contacts

COVID-19 tests are available at no cost, during paid time to all employees, and to all students. . These employees will be provided with the information outlined in paragraph (4)(f), above.⁷

Asymptomatic close contacts may remain on campus if they follow these requirements: (1) monitor for symptoms; (2) wear a highly protective mask around others indoors, except when eating or drinking, for 10 days after the last date of exposure; (3) test with an FDA-authorized viral COVID-19 test (e.g., PCR or Antigen test, including at-home tests) within 3-5 days since the last date of exposure.⁸

⁷ 8 CCR §3205(d)

⁸ Los Angeles County Department of Public Health Order of the Health Officer, Guidance for COVID-19 Exposure Management in Institutes of Higher Education, Revised December 19, 2022.

Exceptions are returned cases as defined in CCR, Title 8, section 3205(b)(11).

Notice of COVID-19 cases⁹

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, Mt San Antonio College 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 who were on the premises at the same worksite as the confirmed case of COVID-19 within the infectious period.
- Provide the notice to the authorized representative, if any, of:
 - The COVID-19 case and of any employee who had a close contact.
 - All employees on the premises at the same worksite as the COVID-19 case within the infectious period.

Mt. San Antonio College will send notice via email to those identified above, who were on the premises at the same worksite as the confirmed case of COVID-19 within the infectious period, that they may have been exposed to COVID-19.¹⁰

Face Coverings¹¹

Employees will be provided face coverings and required to wear them when required by a CDPH regulation or order. This includes spaces within vehicles when a CDPH regulation or order requires face coverings indoors. Face coverings will be clean, undamaged, and worn over the nose and mouth.

The following exceptions apply:

- When an employee is alone in a room or vehicle.
- 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.
- While employees are wearing respirators required by the employer and used in compliance with CCR, Title 8 section 5144.
- 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.
- 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.

Respirators¹²

Respirators will be provided for voluntary use to employees who request them and who are working indoors

⁹ 8 CCR §3205(e)

¹⁰ California Labor Code 6409.6(e)

¹¹ 8 CCR §3205(f)

¹² 8 CCR §3205(g)

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.

Ventilation¹³

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](#). Mt. San Antonio College 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.

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.

Reporting and Recordkeeping¹⁴

Appendix A **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 Human Resources Division 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.

If Mt. San Antonio College identifies a cluster of 3 or more confirmed COVID-19 cases (students and/or employees) with possible connections with each other within a 14-day period (e.g., sharing a defined physical space together like a classroom, workspace, communal area, sports activity, sponsored gathering), the Mt. San Antonio College will report the cluster to Los Angeles County Department of Public Health no later than 1 business day of being notified of the third, or last, case in the cluster.

The report will include the following information: exposure location and/or group membership details, where known, to describe potential connections between the cases (e.g., classroom name/location athletic team name, gathering name/date, etc.), and where possible, which cases are close contacts of each other.¹⁵

¹³ 8 CCR §3205(h)

¹⁴ 8 CCR §3205(j)

¹⁵ Los Angeles County Department of Public Health Order of the Health Officer, Guidance for COVID-19 Exposure Management in Institutes of Higher Education, Revised December 19, 2022.

[Type Title of owner or top management representative formally approving these procedures and have them sign and date]

Appendix A: 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. **We have records that are kept in our Human Resources office.** The investigation and documentation of COVID-19 Cases include all the below requirements.

Date COVID-19 case (suspect or confirmed) became known: **[enter information]**

Date investigation was initiated: **[enter information]**

Name of person(s) conducting the investigation: **[enter name(s)]**

COVID-19 Case Summary

Name	Contact Info	Occupation	Location	Last day and time present	Date of positive test and/or diagnosis	Date of first symptoms

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.]**

Name	Contact Info	Date notified	Date offered COVID-19 testing (employees only)

Summary notice of a COVID-19 case (employees, employers, independent contractors) – during the infectious period and regardless of a close contact occurring.

Name	Date notified

Summary notice of a COVID-19 case (authorized representative of the COVID-19 case and employee who had close contact).

Name	Date notified

What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?
[enter information]

What could be done to reduce exposure to COVID-19?
[enter information]

Was local health department notified? Date?
[enter information]

Additional Consideration #1

COVID-19 Outbreaks

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

Mt San Antonio Community College 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 LA County Department of Health. 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 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.
- 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.