



MetroED
Metropolitan Education District

COVID Protection Plan (CPP)

August 2021

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COVID-19 Prevention Program for Metropolitan Education District

COVID-19 PANDEMIC

The novel coronavirus, SARS-CoV-2, causes a viral respiratory illness called COVID-19, which can make people sick with flu-like and other symptoms. The [virus spreads](#) easily when an infected person sneezes, coughs, or speaks, sending tiny droplets into the air. These droplets can land in the nose, mouth, or eyes of someone nearby and cause illness. This viral illness can also be caught from airborne virus, when small particles of infectious virus remain suspended in the air and people inhale them. People can also become infected if they touch an infectious virus on a surface and then touch their own nose, mouth, or eyes.

Some of the [symptoms](#) of COVID-19 are cough, fever, shortness of breath, and new loss of taste or smell. Some people with mild cases may have no symptoms at all yet still can spread the virus. Avoiding crowded indoor spaces, improving indoor ventilation, staying at least six feet away from people outside of your household, covering your nose and mouth with a face covering, and washing hands often with soap and water can help stop COVID-19 from spreading in the workplace.

COVID-19 PREVENTION PROGRAM

Metropolitan Education District (MetroED) is committed to protecting our employees and preventing the spread of COVID-19 at our workplace. We developed this program to reduce our workers' risk of catching and spreading this virus. We encourage employees to share information about potential COVID-19 hazards at our workplace and assist in evaluating these hazards. We will investigate all workplace illnesses and correct hazards that are identified. We stay informed on the virus presence in our community as well as recommendations made by national and local health agencies. We review and update this plan as necessary. This plan was last reviewed on July 29, 2021.

MetroED will endeavor to keep this program plan up to date and based on the latest regulations and guidance. However, even if this plan is not updated, MetroED will abide by the latest, in effect regulations and guidance notwithstanding the fact that this plan has not been updated.

DESIGNATION OF RESPONSIBILITY

Meagan Azevedo, Director of Human Resources has the authority and responsibility for implementing this plan in our workplace. All managers and supervisors are responsible for implementing this plan in their assigned work areas and ensuring employees' questions are answered in a language they understand.

All employees are required to follow the policies and procedures laid out in this plan, use safe work practices, and assist in maintaining a safe work environment.

IDENTIFICATION AND EVALUATION OF COVID-19 HAZARDS

We evaluate our workplace and operations to identify tasks that may have exposure to COVID-19. The evaluation includes all interactions, areas, activities, processes, equipment, and materials that could present potential exposure to COVID-19. Assessments include employee interactions with all persons who may be present in the workplace: contractors, vendors, students, and members of the public. Evaluations include:

- Identification of places and times when people may gather or come in contact with each other, even if they aren't working. Examples: meetings, trainings, workplace entrances, bathrooms, hallways, aisles, walkways, elevators, and break or eating areas.
- Employees' potential workplace exposure to all persons at the workplace. We will consider how employees and others enter, leave, and travel through the workplace, in addition to addressing stationary work. Examples: co-workers, employees of other businesses, the public, students or families, and independent contractors.
- Existing COVID-19 prevention measures and whether we need different or additional control measures.

Employee Participation - Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: through questions submitted electronically via remote training, safety committees, and staffing meetings. The District has a safety webpage located at <https://www.metroed.net/metroed-safety-committee> where additional information is shared including:

- MetroED Safety Committee meeting agendas, minutes, drills, and goals
- COVID-19 Information
- Injury Illness and Prevention Program
- Reporting a Safety Concern
- Safety Documents
- Notice of Pesticide Use
- Emergency Preparedness

We will evaluate how to maximize ventilation with outdoor air for our indoor spaces and the highest level of filtration efficiency that is feasible for our building mechanical ventilation system. The [CDPH's Interim guidance for Ventilation, Filtration, and Air Quality in Indoor Environments](#) will be used during these evaluations.

Employees may confidentially inform Meagan Azevedo if they have a higher risk for severe illness from COVID-19 to discuss possible options.

CORRECTION OF COVID-19 HAZARDS

We treat all persons, regardless of symptoms or negative test results, as potentially infectious. We select and implement [feasible control measures](#) to minimize or eliminate employee exposure to COVID-19. We review orders and guidance on COVID-19 hazards and prevention from the State of California and the local health department, including general information and information specific to [K-12 School Guidance](#). We correct unsafe or unhealthy conditions, work practices, policies, and procedures in a timely manner based on the severity of the hazard.

We inspect periodically to check that controls are effective, to identify unhealthy work conditions or practices, and to ensure compliance with this plan. Any deficiencies are corrected right away, and we update this plan if needed.

Engineering Controls – Equipment and Building Systems to Minimize Exposures

Our engineering controls for COVID-19 include:

- Maximizing outdoor air for ventilation as much as feasible except when EPA's Air Quality Index is greater than 100 or when increasing outdoor air would cause harm to employees, such as excessive heat or cold.
- Evaluating how to increase filtration efficiency to the highest level compatible with the existing ventilation system.
- Hazards may be reported anonymously by completing the Employee Safety Information Form available on the District's Safety Website <https://www.metroed.net/safety> or by using StopIT <https://appweb.stopitsolutions.com/login> Access Code: MetroED
- Solid and raised partitions are installed and will remain in place for the 2021-2022 school year
- Sneeze barriers installed and will remain up
- Relocating individuals, where feasible, so as to not have too many persons in one area

Administrative Controls – Policies, Procedures, and Practices to Minimize Exposure

Our administrative controls for COVID-19 are:

- **Limiting Access** to the campus to only staff, students and necessary visitors (Cabinet approves visitors for visitor's list).

- **Screening Employees and Visitors** to our facility through the following methods:
 - Home Screening - Employees and visitors must self-screen and obtain a green check mark using an app prior to each time arriving on campus.
 - If a STOP, red mark is obtained, do not come on to campus and follow the instructions.
- **Encouraging virtual meetings.**
 - If virtual cannot take place then meet outdoors.
 - If meeting must occur inside, then outside air supply to the area must be maximized (open doors and windows) to the extent feasible.
 - Take attendance for all indoor, in-person meetings.

Human Resources verifies the vaccination status of all employees, substitutes, contractors and those working on our campus on a regular basis. This information is kept confidentially. All unvaccinated individuals, including those not disclosing, will be considered unvaccinated for quarantining and other related purposes.

Any employee or visitor sick with COVID-19 is to remain off the campus. Anyone exhibiting any potential [symptoms of illness \(including colds or flu\) or COVID-19](#) will be asked to leave the facility immediately and is to contact the **COVID-19 Liaison, Lisa Ketchum at 408-723-4345 or lketchum@metroed.net** for further instructions.

Symptoms include: Fever or 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.

- **Wearing a Face Covering:** We provide face coverings to all employees, students and visitors and ensure they are worn by all regardless of vaccination status when indoors or in vehicles together, and by all employees as required by orders from CDPH. Outdoors is optional (distance is still best). We will not prevent any employee from wearing a face covering when required unless it would create a safety hazard, such as interfering with the safe operation of equipment. The face coverings provided will be cloth or woven material of at least two layers, fit snugly, have no holes or openings, and completely cover the nose and mouth. With the June 2021 revision of the temporary standard, the definition of “face covering” also includes respirators worn voluntarily. Face coverings must be clean and undamaged. **Face coverings are not respiratory protection.**

When employees are required to wear a face covering, the following exceptions will apply:

- When an employee is alone in a room or vehicle.
- While eating or drinking at one’s work area on campus, provided employees are at least six feet apart and outside air supply to the area has been maximized to the extent feasible.
- When employees are required to wear respirators and in accordance with Section 5144.
- When employees cannot wear face coverings due to a medical or mental health condition or disability. This includes a hearing-impaired person or someone using sign language to communicate. Employees exempted from wearing a face covering due to medical conditions, mental health conditions, or disability must wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom that we will provide, if their condition or disability allows.
 - Employees must contact Human Resources for further instructions (doctor’s verification of underlying health condition requiring accommodation).
- When a specific task cannot be performed with a face covering. This exception is limited to the time period in which such tasks are being performed.

Employees not wearing a face covering face shield with drape, or respirator, for any reason, will stay at least six feet away from all other people in the workplace unless they are fully vaccinated or tested at least weekly for COVID-19 during paid time and at no cost to the employee. We will not use these physical distancing or testing provisions as an alternative to face coverings when they are otherwise required by Section 3205.

Signs are posted at the entrance to the workplace to communicate face coverings requirements for everyone entering the facility. We provide face coverings to members of the public if necessary.

- [Practicing Good Hygiene](#). Wash hands with soap and water for at least 20 seconds, or use alcohol-based hand sanitizer with at least 60% alcohol. Hand sanitizer stations and hand hygiene signage are placed throughout the workplace. **Ricky Carrillo, Manager Maintenance and Operations** is responsible for ensuring hand hygiene stations are readily accessible and stocked with soap and paper towels, or sanitizer. Everyone is to wash their hands after blowing nose, touching garbage; before/after preparing food, and after using the toilet.
- [Cleaning and Disinfecting Frequently](#). Surfaces, especially frequently touched surfaces, will be cleaned nightly. Indoor areas, materials, and equipment that will be used by another employee within 24-hours of use by a COVID-19 case will be disinfected with products that meet the [EPA's criteria for use against coronavirus](#) and following the [Healthy Schools Act](#). Employees are not to order any unapproved cleaning or disinfectants products and are not to bring any from home. All products will be maintained by the M & O Department. No products are to be brought from home. An approved cleaning product and disinfectant wipe will be supplied to classrooms and office areas through the Manager of Maintenance and Operations, Ricky Carrillo. All Disinfectants are used according to manufacturer's directions. Employees are trained on the hazards of the disinfectants, to use only in well-ventilated areas, any PPE that is required, and to never mix chemicals. We provide proper personal protective equipment (PPE). PPE must not be shared, e.g., gloves, goggles and face shields, gowns

Personal Protective Equipment (PPE) – Equipment Worn by Employees to Minimize Exposure

In general, employees will not be required to use respirators at MetroED for protection from COVID-19. If a hazard assessment determines respirators are needed, they will be used in accordance with [Title 8, Section 5144](#). Respirators for voluntary use will be provided upon request in the following situations:

- For all employees working indoors or in vehicles who are not fully vaccinated.

When respirators are provided for voluntary use, we will encourage their use, provide the correct size, and ensure use is in compliance with Subsection 5144(c)(2), which includes determining that respirator use will not in itself create a hazard and providing employees with [Appendix D](#) to Section 5144.

Any PPE used to protect from COVID-19, such as gowns, face masks, and gloves, is selected based on function, fit, and availability. Employees are trained when and why PPE is necessary, how to properly put on and take off PPE, and how to clean, maintain, and store reusable PPE. Job hazard assessments are performed by all managers and supervisors to identify any PPE required for a specific job. Managers and supervisors are responsible for ensuring that adequate supplies of PPE are available.

COVID-19 Testing

We will make COVID-19 testing available at no cost and during paid time to employees who have symptoms of COVID-19 and are not fully vaccinated. COVID-19 testing will be made available to employees who have close contact in the workplace as outlined in the INVESTIGATING AND RESPONDING TO COVID-19 CASES IN THE WORKPLACE section below.

- A close contact is someone who was within 6 feet of the infected person for at least 15 minutes at any time beginning 48 hours before the infected person had symptoms or tested positive. Close contacts include people who had 15 minutes of continuous contact with the infected person (indoors) over a 24-hour period, as well as people who had repeated short-duration interactions with the infected person.

INVESTIGATING AND RESPONDING TO COVID-19 CASES IN THE WORKPLACE

Illness at the Workplace

We investigate all COVID-19 cases in the workplace. Our investigation includes seeking information from employees on COVID-19 cases and close contacts, obtaining information on COVID-19 test results and symptom onset, identifying and recording COVID-19 cases, and reporting when required by the regulations.

We maintain a daily log, or other method, to keep track of all employees and visitors at our workplace. This includes name, contact number, date, person(s) contacted, and area of the workplace accessed. We will use this information to identify individuals to contact following notification of a COVID-19 case at our workplace.

We will not reveal any personally identifiable information or employee medical information to any person or entity unless required by law (such as Cal/OSHA, local health department, and local law enforcement).

Notification

Employees must alert **COVID-19 Liaison; Lisa Ketchum at 408-723-4345 or lketchum@metroed.net** if they are having [symptoms of COVID-19](#), had close contact with a COVID-19 case, were diagnosed with COVID-19, or are awaiting test results. We do not discriminate or retaliate against employees for reporting positive test results or symptoms.

Following notification of a positive test/diagnosis, we will immediately take the following actions:

1. Determine the day and time the COVID-19 case was last present at the workplace, the date of the positive test/diagnosis, and the date the COVID-19 case first experienced symptoms.
2. Determine who may have had close contact with the COVID-19 case by reviewing the case's activities during the high-risk period. The high-risk period **for persons who develop symptoms** is from two days before they first develop symptoms until 10 days after symptoms first appeared and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved. The high-risk period **for persons who test positive but never develop symptoms** is from two days before until 10 days after their first positive test for COVID-19 was collected.
3. Within one business day of knowing, or should have known, of a positive test/diagnosis, **Lisa Ketchum** will notify in writing, in a readily understandable form, all employees, independent contractors, and other employers who were at the worksite during the high-risk exposure period, that they may have been exposed. The notice will include our disinfection plan as required by [Labor Code Section 6409.6\(a\)\(4\)](#). Verbal notice will be provided to those employees who have limited literacy in the language of the written notice, or those the employer should reasonably know have not received the written notice. When providing notice under this section, we will not disclose the identity of the infected person(s).
4. Within one business day of knowing, or should have known, of a positive test/diagnosis, Lisa Ketchum will provide notice required by Labor Code section 6409.6(a)(2) and (c) to the authorized representative of any employee at the worksite during the high-risk exposure period.
5. We will make [COVID-19 testing](#) available to our employees who had close contact with the COVID-19 case at no cost during working hours, and information on COVID-19 related benefits, with the following exceptions:
 - Employees who were fully vaccinated prior to close contact and do not have COVID-19 symptoms.
 - COVID-19 cases who have met the return to work criteria and remain symptom free for 90 days after the initial onset of symptoms or the first positive test for asymptomatic cases.NOTE – Fully vaccinated or recovered COVID-19 cases listed above will have testing made available to them if they develop symptoms following close contact in the workplace.
6. Investigate whether any workplace factors contributed to the infection and how to further reduce that potential exposure.

We will provide information about [COVID-19 related benefits at the time of excluding an employee from the workplace due to becoming a COVID-19 case or having close contact](#). **COVID cases and potential cases are handled with confidentiality and only district staff that need to know are made aware.**

We keep a record of and track all COVID-19 cases to include name, contact information, location where the individual was located, the date of the last day at the workplace, and the date of a positive COVID-19 test. This information is kept confidential.

Disinfection after Positive Test/Diagnosis

If it has been less than 24 hours since the COVID-19 positive employee has been in the facility, we will close off any areas used by the sick individual and thoroughly clean and disinfect. If greater than 24 hours will pass before others access the area, the routine cleaning procedures will be followed. During cleaning and disinfection, we will increase outdoor air circulation by opening windows or changing HVAC settings.

Exclusion from the Workplace

The following persons will be excluded from the facility:

- Anyone exhibiting signs of illness (including colds and flu)
- Anyone who tests positive for COVID-19 until the Return to Work criteria in the next section are met.
- Anyone that has had close contact with the COVID-19 case until the Return to Work criteria in the next section are met. This will not apply to the following:
 - Employees who were fully vaccinated prior to close contact and do not develop COVID-19 symptoms.
 - COVID-19 cases who have met the return to work criteria and remain symptom free for 90 days after the initial onset of symptoms or the first positive test for asymptomatic cases.
 - Students will follow the [California Department of Public Health modified quarantine practices](#) under certain conditions.

Employees excluded from work due to a positive test/diagnosis from workplace close contact, or identified as having close contact in the workplace, will have their earnings, wages, seniority, and all other rights and benefits maintained by Human Resources. Wages during exclusion will be paid at the regular rate of pay on the regular payday for the pay period. Employees will be informed if wages will not be maintained because the employee received disability payments or was covered by workers' compensation and received temporary disability. Information on available benefits will be provided at the time of exclusion.

Return to Work

Criteria for returning to work after illness:

- **Employees are to stay home if ill with one or more symptom:** fever or 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 (regardless of vaccination status)
- Enter a sick day into Frontline and contact the COVID-19 Liaison, Lisa Ketchum at 408-723-4245 or lketchum@metroed.net for further instructions
- Prior to returning, employee is to provide the following to the COVID-19 Liaison:
 1. a negative test for COVID-19 (regardless of vaccination status), or
 2. a healthcare provider's note specifying evaluation completed, symptoms are typical of an underlying chronic condition (e.g., allergies or asthma), or alternative, named diagnosis (e.g., Streptococcal pharyngitis, Coxsackie virus), and a COVID-19 test not indicated
 3. At least 24 hours have passed with no fever (100.4°F or above) without the use of fever-reducing medications, **AND**
 4. Other COVID-19 symptoms have improved.

Criteria for returning to work after testing positive for COVID-19 are as follows:

Human Resources will assist with any potential [COVID-19 available Leave](#).

- Employees who tested positive and had symptoms can return to work after clearance from **the COVID-19 Liaison, Lisa Ketchum** when:

- At least 10 days have passed since symptoms began, **AND**
- At least 24 hours have passed with no fever (100.4°F or above) without the use of fever-reducing medications, **AND**
- Other COVID-19 symptoms have improved.
- Employees who test positive but never have symptoms can return to work:
 - After at least 10 days have passed since the date of positive specimen collection.
- Employees who had close contact can return to work:
 - After 10 days have passed since their last known close contact if they never develop symptoms.
 - If symptoms develop, all of the following must be met:
 - Negative PCR COVID-19 test taken after onset of symptoms, **AND**
 - At least 10 days have passed since last known close contact, **AND**
 - The employee has been symptom-free for at least 24 hours without the use of fever reducing medication.
- Employees who have been cleared by the **District COVID-19 Liaison, Lisa Ketchum**, completed the required time to isolate, quarantine, or exclude ordered by a local or state health official can return to work. If the exclusion time-period was not specified, one of the symptom-based criteria above will be used to determine when to return to work.

REPORTING, RECORDKEEPING, AND ACCESS

Reporting

[Reporting to the Local Health Department \(LHD\)](#) – This requirement also complies with AB 685 and AB 86 (2021) and California Code Title 17, section 2500.

Within 24-hours of knowledge, **Lisa Ketchum** will notify the **Santa Clara County Public Health Department (SCCPHD)** of any case of COVID-19 (an outbreak reportable to our SCCPHD is defined as at least three COVID-19 cases among workers at the same worksite within a 14-day period). We will work with the SCCPHD to carry out contact tracing and follow all SCCPHD recommendations including temporary closure of our facility if advised.

[Reporting to our Claims Administrator](#) – **SB 1159** (This section applies to employers with five or more employees)

Meagan Azevedo will report to **Keenan** workers compensation claims when an employee has tested positive for COVID-19. This report will be made within three days of knowledge of an employee's positive test result.

[CAL/OSHA Recording/Reporting](#) - We will record on our 300 log all work-related COVID-19 cases that meet one of the following criteria: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, loss of consciousness, significant injury or illness diagnoses by a physician or other licensed health care professional.

We will report any serious COVID-19 illness that required inpatient hospitalization or resulted in death to our local Cal/OSHA office as soon as possible, but in no case more than eight hours after knowledge.

Recordkeeping

Human Resources maintains records of the steps taken to implement this written program. These records include but are not limited to training, inspections, hazard identification, etc.

We keep a record of and track all COVID-19 cases. These records include the employee's:

- Name
- Contact information

- Occupation
- Location where the employee worked
- Date of the last day at the workplace
- Date of positive COVID-19 test

All medical information is kept confidential. We report information about COVID-19 cases and outbreaks at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.

Access

This program will be made available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA.

COMMUNICATION SYSTEMS

Our goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and that it includes the following information: consistent updates on COVID-19 via email, newsletters, district website and meetings

We ask all employees to confidentially report, without fear of discrimination or retaliation, any symptoms, potential exposures, and possible hazards relating to COVID-19 at the workplace. Employees should make these reports to Lisa Ketchum.

We explain to all employees how we accommodate employees at higher risk of severe COVID-19 illness. They can make a confidential report of their own high-risk condition to Human Resources.

If an employee is suspected of having a workplace exposure to COVID-19 or is experiencing symptoms of COVID-19 and is not fully vaccinated, we will provide information about access to COVID-19 testing at no cost and during paid work hours. We will also provide information about testing to vaccinated employees who develop COVID-19 symptoms after a close contact. Local COVID-19 testing is available in our area through the following:

- [Free COVID testing sites](#) (look for a site that accepts individuals with symptoms)
- [COVID Vaccine Information](#) (The Public Health Department strongly recommends that anyone aged 12 and above get vaccinated now.)

Note: Additional communication requirements may apply depending upon severity of outbreak. See Appendix A for multiple COVID-19 infections and outbreak procedures. See Appendix B for major outbreak procedures.

We communicate information about COVID-19 hazards and our COVID-19 policies and procedures to employees and other employers, persons, and entities that come in contact with our workplace. Other employers must ensure their employees follow our plan or equivalent to ensure protection of both their and our employees. When our employees are at another worksite, we will verify that procedures at the other worksite are protective of our employees, such as mask wearing and symptom screening.

EMPLOYEE TRAINING AND INSTRUCTION

We provide all employees training and instruction on the symptoms of COVID-19 illness and exposure control methods in place at MetroED including:

- Information on how COVID-19 spreads, including airborne and asymptomatic transmission.
- The fact that viral particles can travel more than 6', especially indoors, so physical distancing, face coverings, increased ventilation, and respiratory protection can decrease the spread of COVID-19, but are most effective when used in combination.
- Symptoms of COVID-19.
- The importance of getting a COVID-19 test and staying out of the workplace if you have symptoms.

- The importance of [vaccination against COVID-19](#).
- Information on our COVID-19 policies, how to access COVID-19 testing and vaccination, and the fact that vaccination is effective at preventing COVID-19 – protecting against both transmission and serious illness or death.
- Our symptom screening procedures for employees and all other visitors to the workplace.
- Risk of exposure to COVID-19 on the job.
- Cleaning and disinfection schedules and procedures for our workplace.
- Proper disinfectant on campus.
- Control measures to protect employees from exposure and infection:
 - Requiring employees to stay home when sick.
 - Frequent handwashing with soap and water for at least 20 seconds, or using hand sanitizer when handwashing sinks are not readily accessible.
 - Conditions that require the use of face coverings at the workplace, the recommendation for people who are not fully vaccinated to wear a face-covering if outdoors if 6' of distance between people cannot be maintained, and how to request face coverings at the workplace.
 - Proper use of a face covering when required and the fact that a face covering is NOT respiratory protection. Face coverings are source control used to contain infectious particles and protect others; respirators protect the wearer from infectious airborne particles.
 - Covering coughs and sneezes.
- Acceptable PPE and proper use.
- Policies for providing respirators and the right of employees who are not fully vaccinated to request a respirator for voluntary use. When respirators are provided for voluntary use:
 - How to properly wear the respirator provided, and
 - How to perform a user seal check each time the respirator is donned, and
 - Facial hair can interfere with the seal of the respirator and reduce the amount of protection provided.
- What to do if they are sick and how to obtain a COVID-19 test.
- Information on COVID-19-related leave benefits available under legally mandated sick and vaccination leave, if applicable, workers' compensation law, local governmental requirements, MetroED leave policies, leave guaranteed by contract, and section 3205.
- The contents of this plan.

APPENDIX A - MULTIPLE COVID-19 INFECTIONS AND OUTBREAKS

The following procedures will be followed in addition to our CPP whenever three or more employee COVID-19 cases within an exposed group (as defined in section 3205(b)) have visited our workplace during their high-risk exposure period within a 14-day period. These procedures can be stopped only after no new COVID-19 cases are detected in the exposed group for a 14-day period.

Testing

MetroED will make [testing available to employees within the exposed work group](#) at no cost during working hours except for:

- Employees not present during the outbreak period defined above.
- Employees who were fully vaccinated before the outbreak and do not have symptoms.
- COVID-19 cases who have returned to work after meeting the Return to Work criteria and do not develop symptoms for 90 days since their initial symptom onset or first positive test.

This testing will be made available immediately after determination of an outbreak, and then again one week later; negative test results will not change the quarantine, exclusion, or health order status of any individual. Following these two tests, we will make testing available to employees in the exposed group during the defined outbreak period at least once a week, or more frequently if recommended by the SCCPHD. We will provide additional testing as required by the Division in accordance with any special order from Cal/OSHA.

Additional Controls to Correct COVID-19 Hazards

In addition to the controls listed in our CPP, we will do the following:

- Require employees in the exposed group to wear face coverings when indoors or when outdoors and less than 6' from another person unless one of the exceptions to face coverings listed in our CPP applies.
- Notify employees in the exposed group that they can request a respirator for voluntary use if they are not fully vaccinated.
- Evaluate whether to implement physical distancing of at least 6' between people, and where 6' of distance is not feasible whether to use cleanable solid partitions of sufficient size to reduce COVID-19 transmission.
- In buildings or structures with mechanical ventilation, we will maximize the outdoor air supply, and filter recirculated air with MERV 13 or higher efficiency filters if compatible with the ventilation system. If MERV 13 or higher filters are not compatible we will use filters with the highest rating that are compatible. We will further evaluate whether portable or mounted HEPA filtration units or other air cleaning systems would reduce the risk of transmission and if so implement their use where feasible.

Workplace Investigation, Review, and Hazard Correction

We will investigate all workplace illness to determine potential factors in the workplace that could have contributed to the COVID-19 outbreak. Additionally, we will review our relevant COVID-19 policies, procedures, and controls and we will implement changes needed to prevent further virus spread.

All investigations and reviews will be documented to include:

- Investigation of new or continuing COVID-19 hazards.
- Review of our leave policies and practices, including whether employees are discouraged from staying home when sick.
- Review of our COVID-19 testing policies.
- Investigation of the sufficiency of outdoor air.
- Investigation of the sufficiency of air filtration.

- Investigation into feasibility of physical distancing.

These reviews will be updated with new information, new or previously unrecognized COVID-19 hazards, or as necessary. We will make changes based on investigations and reviews to reduce the spread of COVID-19 and consider such actions as moving work tasks outdoors, allowing employees to work remotely, increasing outdoor air supply to our indoor workplaces, improving air filtration to the highest MERV rating compatible with our air handling system, increasing physical distancing as much as feasible, requiring respiratory protection in compliance with section 5144, or other applicable control measures.

MetroED will endeavor to keep this program plan up to date and will abide by the latest regulations and guidance in effect.

APPENDIX B – MAJOR COVID-19 OUTBREAKS

The following procedures will be followed in addition to our CPP and Appendix A – Multiple COVID-19 Infections and Outbreaks, whenever 20 or more employee COVID-19 cases within an exposed group (as defined in section 3205(b)) have visited our workplace during their high-risk exposure period within a 30-day period. These procedures will apply until there are fewer than three COVID-19 cases detected in the exposed group for a 14-day period.

Testing

MetroED will continue to provide testing as described in Appendix A of our CPP except that testing will be made available to all employees in the exposed group, regardless of vaccination status, twice a week or more frequently if recommended by the Santa Clara County Public Health Department.

Additional Controls to Correct COVID-19 Hazards

In addition to the controls listed in our CPP and Appendix A, we will do the following:

- Provide respirators for voluntary use to employees in the exposed group and determine the need for a respiratory protection program or changes to our existing program to address COVID-19 hazards and be in compliance with section 5144.
- Any employee in the exposed work group not wearing a respirator required by MetroED in compliance with section 5144 will be separated from other people by 6' except when demonstrated to not be feasible or when they are momentarily closer than 6' during movement. When it is not feasible to maintain 6' of distance, individuals will be as far apart as feasible. Methods for physical distancing include:
 - Reducing the number of persons in an area at one time (including visitors)
 - Visual cues such as signs and floor markings to show employee locations and paths of travel
 - Staggered arrival, departure, work, and break times
 - Adjusted work processes (such as reducing production speed) to allow greater distance between employees
 - Telework or other remote work arrangement
- At workstations such as cash registers, and desks where an employee is assigned to work for an extended period of time and physical distancing is not maintained at all times, we will install cleanable solid partitions that will effectively reduce transmission.
- Evaluate whether to halt some or all operations at the workplace until COVID-19 hazards have been corrected.
- Take other control measures deemed necessary by the Division through the Issuance of Order to Take Special Action, in accordance with [Title 8 Section 332.3](#).

The update IIPP/COVID-19 Addendum, COVID Protection Plan (CPP) has been reviewed and approved by the MetroED Safety Committee on XXX.

