COVID-19 Prevention Plan (CPP)
District Employee Requirements and Resources

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# Table of Contents

I. **Purpose** .................................................................................................................................................. 2

II. **Scope** .................................................................................................................................................... 2

III. **Plan** ........................................................................................................................................................ 3

   A. **Communication Systems** .................................................................................................................. 3
      Reporting COVID-19 Symptoms, Possible COVID-19 Close Contact Exposures, and Possible COVID-19 Hazards at District Worksites and Facilities........................................................................ 3
      Accommodations Process for District Employees with Medical or Other Conditions that put them at Increased Risk of Severe COVID-19 Illness ............................................................................... 4
      COVID-19 Testing ...................................................................................................................................... 5
      COVID-19 Hazards..................................................................................................................................... 5

   B. **Identification and evaluation of COVID-19 hazards at worksites and facilities** ....................... 6
      Screening and Tracing District Employees for COVID-19 Symptoms ....................................................... 6
      Responding to District Employees with COVID-19 Symptoms ................................................................ 6
      District’s Response to Confirmed COVID-19 Cases .................................................................................. 7
      Workplace-Specific Identification of COVID-19 Hazards ....................................................................... 8
      COVID-19 Prevention Training .................................................................................................................. 8
      Maximization of Outdoor Air and Air Filtration ......................................................................................... 8
      Heating, Ventilation and Air Conditioning (HVAC) Systems .................................................................... 9
      District Compliance with Applicable State and Local Health Orders ....................................................... 9
      Evaluation of Existing COVID-19 Prevention Controls and Adoption of Additional Controls ............ 9
      Periodic Inspections .................................................................................................................................. 9

   C. **Investigating and Responding to COVID-19 Cases in the Worksites and Facilities** ............. 10
      Procedure to Investigate COVID-19 Cases ............................................................................................... 10

   D. **Personal Protective Equipment (PPE) and Social Distancing Requirements** ..................... 11
      Social Distancing Protocols ..................................................................................................................... 13
I. Purpose

The purpose of the Foothill-De Anza Community College (District) COVID-19 Prevention Plan ("District CPP") is to provide employees a healthy and low risk workplace as required under the California Occupational Safety and Health Act (Labor Code §§ 6300, et seq.) and associated regulations (8 C.C.R. § 3205).

Nothing in the District CPP precludes the District from complying with federal, state, or local laws or guidance that recommends or requires measures that are more prescriptive and/or restrictive than are provided herein. Specifically, the District is governed by the regulations imposed by the Santa Clara County Department of Public Health. The latest guidelines can be obtained at Santa Clara County COVID-19.

II. Scope

The onsite requirements of the District CPP apply to all District employees who perform part or all of their duties on site. The requirements determining when employees are allowed to come on campus apply to all employees.

DEFINITIONS:

For the purposes of the District CPP, the following definitions shall apply:

- **COVID-19**: coronavirus disease, an infectious disease caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).
- **COVID-19 case**: a person who either: (1) has a positive “COVID-19 test” as defined in this section; (2) is subject to COVID-19-related order to isolate issued by a local or state health official; or (3) has died due to COVID-19, in the determination of a local health department or per inclusion in the COVID-19 statistics of a county. A person is no longer a “COVID-19 case” when a licensed health care professional determines that the person does not have COVID-19, in accordance with recommendations made by the California Department of Public Health (CDPH) or the local health department pursuant to authority granted under the Health and Safety Code or Title 17, California Code of Regulations, to the CDPH or the local health department.
- **Close contact COVID-19 exposure**: being within six (6) feet of a COVID-19 case for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the “high-risk exposure period” as defined here. This definition applies regardless of the use of face coverings.
- **COVID-19 hazard**: exposure to potentially infectious material that may contain SARS-CoV-2, the virus that causes COVID-19. Potentially infectious materials include airborne droplets, small particle aerosols, and airborne droplet nuclei, which most commonly result from a person or persons exhaling, talking or vocalizing, coughing, sneezing, or procedures performed on persons which may produce aerosolized saliva or respiratory
tract fluids, among other things. This also includes objects or surfaces that may be contaminated with SARS-CoV-2.

- **COVID-19 symptoms**: includes at least one of the following: (1) fever of 100.4 degrees Fahrenheit or higher or chills; (2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches; (6) headache; (7) new loss of taste or smell; (8) sore throat; (9) congestion or runny nose; (10) nausea or vomiting; or (11) diarrhea, unless a licensed health care professional determines the person’s symptoms were caused by a known condition other than COVID-19.

- **COVID-19 test**: a viral test for SARS-CoV-2 that is both: (1) Approved by the United States Food and Drug Administration (FDA) or has an Emergency Use Authorization from the FDA to diagnose current infection with the SARS-CoV-2 virus; and (2) Administered in accordance with the FDA approval or the FDA Emergency Use Authorization as applicable.

- **Exposed workplace**: any work location, working area, or common area at work used or accessed by a COVID-19 case during the high-risk period, including bathrooms, walkways, hallways, aisles, break or eating areas, and waiting areas. The exposed workplace does not include buildings or facilities not entered by a COVID-19 case. Effective January 1, 2021, the “exposed workplace” also includes but is not limited to the “worksite” of the COVID-19 case as defined by Labor Code section 6409.6(d)(5).

- **Face covering**: a tightly woven fabric or non-woven material with no visible holes or openings, which covers the nose and mouth.

- **High-risk exposure period**: the time period: (1) For persons who develop COVID-19 symptoms: from two (2) days before they first develop symptoms until ten (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; or (2) for persons who test positive who never develop COVID-19 symptoms: from two (2) days before until ten (10) days after the specimen collection for their first positive test for COVID-19.

### III. Plan

#### A. Communication Systems

**Reporting COVID-19 Symptoms, Possible COVID-19 Close Contact Exposures, and Possible COVID-19 Hazards at District Worksites and Facilities.**

District policy requires that employees immediately report to their manager or supervisor or to the Office of Human Resources any of the following:

1. The employee’s presentation of COVID-19 symptoms.
2. The employee’s possible COVID-19 close contact exposures.
3. Possible COVID-19 hazards at District worksites or facilities.
The District will not discriminate or retaliate against any employee who makes such a report.

**Accommodations Process for District Employees with Medical or Other Conditions that put them at Increased Risk of Severe COVID-19 Illness**

District policy provides for an accommodation process for employees who have a medical or other condition identified by the Centers for Disease Control and Prevention (CDC) or the employee’s health care provider as placing or potentially placing the employee at increased risk of severe COVID-19 illness.

The CDC identifies the following medical conditions and other conditions as placing or potentially placing individuals at an increased risk of severe COVID-19 illness:

- Cancer
- Chronic kidney disease
- COPD (chronic obstructive pulmonary disease)
- Heart conditions, such as heart failure, coronary artery disease, or cardiomyopathies
- Immuno-compromised state (weakened immune system) from solid organ transplant
- Obesity (body mass index [BMI] of 30 kg/m² but < 40 kg/m²)
- Severe Obesity (BMI ≥ 40 kg/m²)
- Pregnancy
- Sickle cell disease
- Smoking
- Type 2 diabetes mellitus

The CDC guidance also provides that adults of any age with the following conditions might be at an increased risk for severe illness from the virus that causes COVID-19:

- Asthma (moderate-to-severe)
- Cerebrovascular disease (affects blood vessels and blood supply to the brain)
- Cystic fibrosis
- Hypertension or high blood pressure
- Immuno-compromised state (weakened immune system) from blood or bone marrow transplant, immune deficiencies, HIV, use of corticosteroids, or use of other immune weakening medicines
- Neurologic conditions, such as dementia
- Liver disease
• Overweight (BMI > 25 kg/m² but < 30 kg/m²)
• Pulmonary fibrosis (having damaged or scarred lung tissues)
• Thalassemia (a type of blood disorder)
• Type 1 diabetes mellitus

Appropriate staff will periodically review the following web address in order to account for any additional medical conditions and other conditions that the CDC has identified as placing or potentially placing individuals at an increased risk of severe COVID-19: https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html.

Employees are encouraged to review the list of medical and other conditions provided above in order to determine whether they have such a condition.

To request an accommodation under the District policy, employees may make a request with their manager or supervisor or the Office of Human Resources.

COVID-19 Testing

The District possesses the authority to require that employees who report to work at District worksites or facilities be tested for COVID-19. When employees are required to be tested, they will be informed of the reason that testing is required. Testing sites for anyone can be found at www.sccfreetest.org.

The Office of Human Resources will inform employees of possible consequences of a positive COVID-19 test, which may include, but are not limited to, a requirement that the employee not report to onsite work during the high-risk exposure period until they satisfy the minimum criteria to return to onsite work.

When the District requires testing, it has adopted policies and procedures that ensure the confidentiality of employees and comply with the Confidentiality of Medical Information Act (“CMIA”). Specifically, the District will keep confidential all personal identifying information of COVID-19 cases or persons with COVID-19 symptoms unless expressly authorized by the employee to disclose such information or as otherwise permitted or required under the law.

COVID-19 Hazards

The Office of Human Resources will notify affected employees of any potential COVID-19 exposure at a worksite or facility where a COVID-19 case and employees were present on the same day. It is the responsibility of the manager to notify affected vendors of any potential COVID-19 exposure at a worksite or facility where a COVID-19 case and the vendor were present on the same day. Notifications of such potential exposures will be made within one (1) business
day, in a way that does not reveal any personal identifying information of the COVID-19 case.

B. Identification and evaluation of COVID-19 hazards at worksites and facilities.

Screening and Tracing District Employees for COVID-19 Symptoms

The District possesses authority to require that an employee self-screen for COVID-19 symptoms prior to reporting to any District worksite or facility. **OptimumHQ** is the platform through which self-screening data will be reported. The results of this self-screening are reported through the *OptimumHQ* website or mobile application (app).

Designated managers will add employees to the online program. As required, employees will answer a questionnaire prior to coming onto worksites in order to receive an approved badge.

*OptimumHQ* is also being used to trace the locations of employees when they are on district sites. Where possible, employees should scan the bar code for the area(s) they are accessing throughout the day.

Responding to District Employees with COVID-19 Symptoms

Should a District employee present with COVID-19 symptoms during a self-screening, the employee should immediately notify either their supervisor or Human Resources. The employee should remain at or return to their home or place of residence and not report back to onsite work until such time as the employee satisfies the minimum criteria to return to work.

The Office of Human Resources will advise employees of any leaves to which they may be entitled during this self-quarantine period through a follow-up call after the initial employee notification.

Further, the District has adopted policies and procedures that ensure the confidentiality of employees and comply with the Confidentiality of Medical Information Act (CMIA) and will not disclose to other employees the fact that the employee presented COVID-19 symptoms.
District’s Response to Confirmed COVID-19 Cases

In the event that an employee tests positive for COVID-19 or is diagnosed with COVID-19 by a health care provider, the Office of Human Resources will instruct the employee to remain at or return to their home or place of residence and not report back to work until such time as they satisfy the minimum criteria to return to work.

The Office of Human Resources will advise employees of any leaves to which they may be entitled during this self-quarantine period through a follow-up call after the initial employee notification.

The District will comply with all reporting and recording obligations as required under the law, including, but not limited to, reporting the COVID-19 case to the following individuals and institutions as required based upon the individual circumstances:

- The local health department.
- Cal/OSHA.
- Employees who were present at a District worksite or facility when the COVID-19 case was present.
- The District’s workers’ compensation program administrator.

If possible, the Office of Human Resources will interview the employee with the COVID-19 diagnosis in order to determine the nature and circumstances of any contact that the employee may have had with other employees during the high-risk exposure period. If Human Resources determines that there were any close contact COVID-19 exposures, they will contact those employees with applicable instructions as defined by CDC, state and county guidelines.

The District has adopted policies and procedures that ensure the confidentiality of employees and comply with the Confidentiality of Medical Information Act (CMIA) CMIA. Specifically, the District will not disclose to other employees, except for those who need to know, the fact that the employee tested positive for or was diagnosed with COVID-19. Further, the District will keep confidential all personal identifying information of COVID-19 cases or persons unless expressly authorized by the employee to disclose such information or as otherwise permitted or required under the law.
Workplace-Specific Identification of COVID-19 Hazards

The District will continuously assess workplace-specific interactions, areas, activities, processes, equipment, and materials that could potentially expose employees to COVID-19 hazards.

As part of this process, the District will monitor potential workplace exposure to all persons at all worksites and facilities, including employees, employees of other entities, students, members of the public, customers or clients, and independent contractors. Whenever possible, the colleges will encourage the use of outside spaces for the gathering of groups of staff or students.

The District will consider how employees and other persons enter, leave, and travel through worksites and facilities, in addition to addressing employees' fixed workspaces or workstations.

As part of this process, the District will treat all persons, regardless of symptoms or negative COVID-19 test results, as potentially infectious.

Going forward, all of the above will be continued until no longer required by the applicable state or county agency.

COVID-19 Prevention Training

The District has provided COVID-19 specific training entitled “Staying Healthy in a Changing Environment for All Employees.” This training is available by going through the Employee Training app in MyPortal to reach the district’s Employee Training Resource Center within the Vision Resource Center. The training includes information about the COVID-19 virus and practical preventative measures that can be used in an employee’s personal and professional life to reduce risk of contracting the virus. The training is mandatory for all classified and management staff as well as full-time faculty and is strongly recommended for part-time faculty.

Other departments, such as, but not limited to, Facilities, the Child Development Center or Nursing instruction programs may have additional trainings specific to their particular areas or disciplines.

Maximization of Outdoor Air and Air Filtration

For indoor worksites and facilities, the District will evaluate how to maximize the quantity of outdoor air that can be brought into the indoor location. In addition,
where possible, the filtration efficiency will be increased to the highest level compatible with the existing ventilation systems.

**Heating, Ventilation and Air Conditioning (HVAC) Systems**

The District performs regular maintenance on its HVAC systems and has utilized settings to provide the greatest amount of outside air to be brought in through the system. In addition, the filters are currently at the MERV 13 level, the highest that the current system can utilize. Due to its centralized format, at the Foothill campus an infrared system has been installed that further reduces the presence of viruses in the air flow. Due to its decentralized system, the De Anza campus does not have this feature.

**District Compliance with Applicable State and Local Health Orders**

The District will monitor applicable orders and guidance from the state of California and the Santa Clara County Department of Public Health related to COVID-19 hazards and prevention. The District will fully comply with all applicable orders and guidance from the state of California and the local public health department.

**Evaluation of Existing COVID-19 Prevention Controls and Adoption of Additional Controls**

Periodically, the District will evaluate existing COVID-19 prevention controls at the workplace and assess whether there is a need for different and/or additional controls. This includes evaluation of controls related to the correction of COVID-19 hazards, physical distancing, face coverings, engineering controls, administrative controls, and personal protective equipment (PPE).

**Periodic Inspections**

As necessary, the District will conduct periodic inspections of worksites and facilities to identify unhealthy conditions, any issues with work practices, and work procedures related to COVID-19 to ensure compliance with its COVID-19 policies and procedures.
C. Investigating and Responding to COVID-19 Cases in the Worksites and Facilities

Procedure to Investigate COVID-19 Cases

The District has a procedure for investigating COVID-19 cases in the workplace. As described below, the procedure includes the following:

- Verifying of COVID-19 diagnosis.
- Receiving information regarding COVID-19 test results.
- Receiving information regarding the presentation of COVID-19 symptoms.
- Identifying and recording all COVID-19 cases.

All employees, whether working remotely or on campus, should immediately report symptoms, exposure, or positive test results to their supervisor and/or appropriate administrator.

All Employees

Step 1 – Supervisor to obtain information from the employee to include employee name and date and time of contact/report.

- Workers with COVID-19 symptoms should not come to the workplace or should be sent home immediately if they have COVID-19 symptoms.
- It is imperative that the supervisor act promptly to avoid further risk of transmission from the employee.

Step 2 – The supervisor should immediately report the COVID-19 case to the Associate Vice Chancellor of Human Resources (HR). The Associate Vice Chancellor of HR will contact the employee and collect the following information:

- Employee name
- Symptoms/date and time of onset of symptoms
- Date of testing sample
- Information on possible exposure to others (name(s), phone contact information)

Step 3 – The supervisor should follow up with the employee to discuss remote work expectations. If the employee is still able to perform work
remotely, then those options should be discussed. If the employee is unable to continue working during a quarantine/isolation period and will be using leave, the supervisor will arrange for backup coverage of the usual assignments.

D. Personal Protective Equipment (PPE) and Social Distancing Requirements

Required Use of Face Coverings

According to the California Department of Public Health (CDPH), wearing a face covering over the nose and mouth can be a critical component of reducing the transmission of the COVID-19 virus. Wearing a mask can slow the spread of COVID-19 by limiting the release of virus into the air and can reduce the wearer’s exposure to infectious droplets through filtration. It also reinforces physical distancing and shows concern for the health of others. As the state and country have gone through various improvements and declines in the levels of positivity rates, exposure and hospitalization, requirements for wearing a face covering have also changed.

Under the latest August 2, 2021, Santa Clara County Public Health Order, the use of universal indoor face coverings is mandated/required when a person is in a public space. Face coverings are permitted to be removed indoors in situations where it is not practical to wear one, such as in dining situations, as necessary for medical procedures and during water sports. Masks should be worn outdoors when individuals are in large groups and are not able to socially distance.

The Foothill-De Anza District at minimum will follow the most restrictive directive issued by the county, state or federal government. On July 17, 2021, the district took the preemptive step of requiring face coverings indoors even though at the time it was not required by any other government agency directive. The district will continue to monitor the situation and make changes as necessary to reduce the risk to its students, staff and faculty.

On July 28, 2021, the California Department of Public Health (CDPH) issued an update of Guidance on the Use of Face Coverings. Exceptions, excerpted from the update, are presented below.

Individuals are exempt from wearing a mask if they are:

- Persons younger than two years old. Very young children must not wear a mask because of the risk of suffocation.
- Persons with a medical condition, mental health condition, or disability that prevents wearing a mask. This includes persons with a medical condition for
whom wearing a mask could obstruct breathing or who are unconscious, incapacitated, or otherwise unable to remove a mask without assistance.

- Persons who are hearing impaired, or communicating with a person who is hearing impaired, where the ability to see the mouth is essential for communication.
- Persons for whom wearing a mask would create a risk to the person related to their work, as determined by local, state, or federal regulators or workplace safety guidelines.

**Note:** Persons exempted from wearing a face mask due to a medical condition who are employed in a job involving regular contact with others must wear a non-restrictive alternative, such as a face shield with a drape on the bottom edge, as long as their condition permits it. Contact the Office of Human Resources for information about a face shield accommodation.

The district will provide surgical-style (flat) masks to employees who request them.

**Hand sanitizer**
The district has distributed hand sanitizer to classrooms and common areas throughout the district. Its use is encouraged when hand washing is not available.

**Sanitizing Wipes**
The district has distributed sanitizing wipes to classrooms and common areas throughout the district.

**Cleaning**
The district’s custodial staff has been provided with specific training regarding cleaning protocols. The campuses and Central Services are coordinating efforts to ensure consistency in cleaning protocols across the district.

**Other PPE Needs**
Please contact your immediate manager/supervisor if you have any questions or require additional protective equipment.
Social Distancing Protocols

Avoid Close Contact Inside Your Home
- Avoid close contact with people who are sick.
- If possible, maintain 6 feet between the person who is sick and other household members.

Avoid Close Contact Outside Your Home
- Put 6 feet of distance (about 2 arm lengths) between yourself and people who do not live in your household.
- Remember that some people without symptoms may be able to spread the virus.
- Keeping distance from others is especially important for people who are at higher risk of getting very sick.

Hand Washing
Wash hands with soap and water for at least 20 seconds. If soap and water are not available, use an alcohol-based hand sanitizer that contains at least 60% alcohol.