

# COVID-19 Prevention Program (CPP) for National University System

This CPP is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace.

**Date: January 15, 2022**

## Authority and Responsibility

The National University System Safety Response Team 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 program 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.

## Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Document the vaccination status of our employees by using **Appendix E: Documentation of Employee COVID-19 Vaccination Status**, which is maintained as a confidential medical record
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Develop COVID-19 policies and procedures to respond effectively and immediately to individuals at the workplace who are a COVID-19 case to prevent or reduce the risk of transmission in the workplace, including but not limited to cleaning and disinfecting protocols, screening process, assessment and notification of close contact within the workplace and the maintenance of safety measures while at the campus.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the **Appendix B: COVID-19 Inspections form** as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.
- Conduct employee screening upon arrival, including temperature check, questionnaire and log time entering and exiting the building.
- Conduct training and instruction to our staff, administration and faculty on best practices to keep them and those around them safe and healthy during the COVID-19 pandemic

## Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

- Participating in COVID-19 prevention training
- Participating in contact tracing through digital applications on their mobile devices

- Exposure to safety best practices through signage throughout the worksite.

### **Employee screening**

We screen our employees by:

- Requiring that they self-screen at home for COVID-19 related symptoms as updated by the Center for Disease Control and Prevention and the California Department of Public Health.
- Physically screening employees upon arrival for temperature check (non-contact) and questionnaire
- Requiring social distancing and face coverings at all times while onsite including adjacent parking area.

### **Correction of COVID-19 Hazards**

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

- Employees are responsible for reporting any unsafe or unhealthy working condition to their supervisor and the Facilities/Security Department who will inform Human Resources and the Safety Response Team as appropriate.
- The Facilities Department will take prompt action to inspect, correct and document the details of the incident for recordkeeping and reporting as appropriate.
- Facilities can be reached at 858-309-3555

### **Control of COVID-19 Hazards**

#### **Physical Distancing**

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

- **Maximizing temporary remote-work opportunities for eligible employees**
- **Requiring employees notify Facilities/Security of their planned visit to promote staggered arrival and work**
- **Providing employees coming onsite for any reason with physical distancing and other safety precautions prior to arrival**
- **Posting signage at screening checkpoints and throughout reinforcing physical distancing requirements**

**Individuals** will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

#### **Face Coverings**

Upon entrance to our facilities, we post signage with requirements to safely enter and engage with others while on campus. We require employees to provide their face covering prior to arrival. For guests and employees who do not bring a face covering, we provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department. Employees who fail to wear their face covering appropriately will be reminded to do so and may be subject to discipline under organizational policies.

The following are exceptions to the use of face coverings in our workplace:

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
- 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 six feet apart.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19.

### **Engineering controls**

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

- The work site has installed solid partitions in high-traffic locations and where six-foot distancing cannot be accomplished

For indoor locations, using Appendix B, we identify and evaluate how to maximize, to the extent feasible, ventilation with outdoor air using the highest filtration efficiency compatible with our existing ventilation system, and whether the use of portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems, would reduce the risk of transmission by

- Increasing Building air filtration from MERV 8 to MERV 13 filtration decreasing the potential for airborne transmission through the building

### **Cleaning and disinfecting**

We implement the following cleaning and disinfection measures for frequently touched surfaces:

- **Providing cleaning and disinfection supplies for employees working onsite**
- **Promoting regular cleaning of personal workspace**
- **Keeping a regular increased cleaning protocol for cleaning and disinfecting high-traffic and communal areas**

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

- The Safety Response Team's Case Processing Unit intakes the details of a reported positive case onsite
- Case Processing Unit notifies the Facilities Department of the need to deep clean and disinfect the building where the positive case was reported
- The Facilities Department schedules an external cleaning company to perform a deep cleaning and disinfecting of the subject building within 24 hours of the report from the Case Processing Unit

### **Shared tools, equipment and personal protective equipment (PPE)**

PPE must not be shared, e.g., gloves, goggles and face shields.

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, employees will be provided with cleaning and disinfecting supplies and required to clean/disinfect after each use. Employees will also be provided with hand sanitizer.

## Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Post signage regarding health and safety best practices including the regular use of hand sanitizer and appropriate hand washing
- Provide employees with effective hand sanitizer stations throughout the worksite and exclude hand sanitizers that contain methanol (i.e. methyl alcohol)
- Encouraging and allowing time for employee handwashing
- Encouraging employees to wash their hands for at least 20 seconds each time

## Personal protective equipment (PPE) used to control employees' exposure to COVID-19

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.

Upon request, we provide respirators for voluntary use to all employees who are not fully vaccinated and who are working indoors or in vehicles with more than one person.

We provide and ensure use of respirators in compliance with section 5144 when deemed necessary by Cal/OSHA.

We also provide and ensure use of eye and respiratory protection when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

## Testing of symptomatic employees

We make COVID-19 testing available at no cost to all employees who had close contact in the workplace and have COVID-19 symptoms, during employees' paid time

## Investigating and Responding to COVID-19 Cases

We have developed effective procedures to investigate COVID-19 cases that include seeking information from our employees regarding COVID-19 cases, close contacts, test results, and onset of symptoms. This is accomplished by using the **Appendix C: Investigating COVID-19 Cases** form.

We also ensure the following is implemented:

- **Employees that had a close contact are offered COVID-19 testing at no cost during their working hours, except for COVID-19 cases who were allowed to return to work per our return-to-work criteria and have remained free of symptoms for 90 days after the initial onset of symptoms, or for cases who never developed symptoms, for 90 days after the first positive test.**
- **The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to these employees.**
- **Written notice within one business day of our knowledge of a COVID-19 case that people at the worksite may have been exposed to COVID-19. This notice will be provided to all employees (and their authorized representative), independent contractors and other employers on the premises at the same worksite as the COVID-19 case during the high-risk exposure period. These notifications will meet the requirements of T8 CCR section 3205(c)(3)(B) and Labor Code section 6409.6(a)(4); (a)(2); and (c).**
- **We consider a "close contact" that meets the definition as described in section 3205(b)(1) definition; "high-risk exposure period" meets the section 3205(b)(10) definition; and "worksite" meets the section 3205(b)(12) definition**

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## **System for Communicating**

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:

- Who employees should report COVID-19 symptoms and possible hazards to, and how through training and notices acknowledging individual responsibility for health and safety best practices
- That employees can report symptoms and hazards without fear of reprisal
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness
- In the event we are required to provide 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.
- Information about COVID-19 hazards employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures.

## **Training and Instruction**

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable 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 have no symptoms.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel more than six 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 hand sanitizer when employees do not 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, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

## Exclusion of COVID-19 Cases

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case, unless:
  - Employees who were fully vaccinated before the close contact and who do not develop COVID-19 symptoms, provided they wear a face covering and maintain six feet of physical distance from others in the workplace for 14 days following the last date of close contact.
  - COVID-19 cases who returned to work per our return-to-work criteria and have remained free of COVID-19 symptoms do not need to be excluded from the workplace for 90 days after the initial onset of COVID-19 symptoms, provided they wear a face covering and maintain six feet of distance from others in the workplace for 14 days following the last date of close contact.
  - COVID-19 cases who returned to work per our return-to-work criteria who never developed COVID-19 symptoms do not need to be excluded from the workplace for 90 days after the first positive test, provided they wear a face covering and maintain six feet of distance from others in the workplace for 14 days following the last date of close contact.
- If we do not exclude an employee who had a close contact as permitted by the above three exceptions, we will provide the employee with information about any applicable precautions recommended by CDPH for individuals with close contact.
- For employees excluded from work, continuing, and maintaining employees' earnings, wages, seniority, and all other employees' rights and benefits. This will be accomplished by:
  - 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. This will be accomplished by Human Resources contacting impacted employee regarding available benefits, including, sick-leave and reinforcing return-to-work requirements
  - Providing employees at the time of exclusion with information on available benefits.

## Reporting, Recordkeeping, and 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 any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use the **Appendix C: Investigating COVID-19 Cases** form 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, with personal identifying information removed.

## Return-to-Work Criteria

- **COVID-19 cases with symptoms** will not return to work until all the following have occurred:
  - At least 24 hours have passed since a fever of 100.4 °F. or higher has resolved without the use of fever-reducing medications, and
  - COVID-19 symptoms have improved, and
  - At least 10 days have passed since COVID-19 symptoms first appeared.
- **COVID-19 cases who tested positive but never developed symptoms** will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
- A negative COVID-19 test will not be required for an employee to return to work once the requirements for “cases with symptoms” or “cases who tested positive but never developed symptoms” (above) have been met.
- Persons who had a close contact may return to work as follows:
  - Close contact but never developed symptoms: after 14 days have passed since the last known close contact unless either of the following exceptions apply:
    - Ten days have passed since the last known close contact and the person wears a face covering and maintains six feet of physical distance from others while at the workplace for 14 days following the last date of close contact.
    - Seven days have passed since the last known close contact; the person tested negative for COVID-19 using a COVID-19 test with the specimen taken at least five days after the last known close contact; and the person wears a face covering and maintains six feet of physical distance from others while at the workplace for 14 days following the last date of close contact.
  - Close contact with symptoms: when the “COVID-19 cases with symptoms” criteria (above) have been met.

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

## Contact Information

**If you observe an unsafe or unhealthy working condition, please contact:**

Security: (858) 642-8892 or email [safety@nu.edu](mailto:safety@nu.edu)

Facilities: (858) 309-3555 or email [incidents@nu.edu](mailto:incidents@nu.edu)

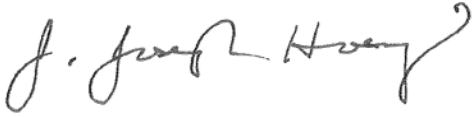
**If you are experiencing COVID-19 symptoms and cannot report to work or class or if you have tested positive for COVID-19, please contact the following numbers below for confidential advising:**

For Faculty, Administration and Staff: *Human Resources Benefits* (858) 642-8199 or email [benefits@nu.edu](mailto:benefits@nu.edu)

For Students: *Student Accessibility Services* (858) 521-3967 or email [sas@nu.edu](mailto:sas@nu.edu)

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Reviewed by:

A handwritten signature in black ink, appearing to read "J. Joseph Hoey". The signature is written in a cursive style with a large, sweeping flourish at the end.

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**J. Joseph Hoey, Ed.D.**  
**Vice Provost for Academic Services**  
**National University**  
**Chair, NUS Safety Response Team**

January 31, 2022  
**Date**