

San José State University Research Foundation

COVID-19 Prevention Program (CPP)

This document provide specific guidance during the COVID-19 world pandemic period, and it serves as the COVID-19 Prevention Plan (CPP) in compliance with the REVISED Cal/OSHA Emergency Temporary Standards (ETS) 8 CCR Section 3205(c), effective June 17, 2021.

Authority and Responsibility

The Human Resources Director 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 implement the following in our workplace:

- Conduct workplace-specific evaluations to identify COVID-19 hazards at work locations, offices and others areas where employees work. Evaluations of campus offices have been managed by campus EH&S. Project Directors shall evaluate hazards in areas under their specific control (locations where building is managed by third party). Project may use the Appendix A: Identification of COVID-19 Hazards Form to evaluate the workplace or may draft other written guidance to communicate hazards to employees.
- Document the vaccination status of our employees via [secure google form](#), which is maintained as a confidential record. Project directors will be notified who is required to wear a mask.
- 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. The most up to date information on the Research Foundation policies and procedures can be found at the following sites: <https://www.sjsu.edu/researchfoundation/news-updates/covid.php>
<https://www.sjsu.edu/healthadvisories/>
- 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 and evaluate unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.

- Employees that are located outside of Central Office should follow the workplace guidelines of the facility in which they are located.

Employee Participation

- Employees are encouraged to participate in the identification and evaluation of COVID-19. Additionally, all employees must review and complete the mandatory SJSU COVID-19 Health and Safety Protocols Training in CSULearn.
- Employees that are located outside of Central Office have an obligation to understand and follow the policies and procedures of the facility in which they are located.

Employee screening

We screen our employees and respond to those with COVID-19 symptoms by:

- Requiring employees' self- screen according to CDPH guidelines using our [Symptom Check Tool](#) before coming into their work location.
- Symptomatic employees are instructed to stay home and to contact their medical provider if they have symptoms or had close sustained contact with a known positive case of COVID-19.
- Employees that are located outside of Central Office should follow the protocols of the facility in which they are located.
- Employees who test positive for COVID-19 should contact Human Resources at research-foundation-compliance@sjsu.edu. HR will assist with return to work guidance. Remote workers should contact their primary care clinicians for information about testing and all employees should seek care from their primary care provider for evaluation and treatment if ill.

Correction of COVID-19 Hazards

COVID-19 hazards are treated like other workplace injuries or illnesses. Project directors, managers and supervisors have primary responsibility for ensuring safe working conditions and correcting hazards. In the event of a workplace acquired infection, managers or supervisors will notify Human Resources immediately. Human Resources is available for consultation and investigation support.

Unsafe or unhealthy work conditions, practices or procedures related to COVID-19 may be documented using the Appendix B: COVID-19 Inspections form provided in this CPP. Managers and supervisors shall correct hazards in a timely manner based on the severity of the hazards, and shall follow up to ensure corrective actions have been taken. Human Resources can also assist with personnel issues related to COVID-19.

Control of COVID-19 Hazards

Face Coverings

We provide clean, undamaged face coverings to all employees upon request. We require that they are properly worn by employees that are not fully vaccinated when they are indoors, or in vehicles, and where required by orders from the California Department of Public Health (CDPH). Employees that are required to wear a face covering or chooses to wear a face covering must properly wear them to cover the nose and mouth. All employees can request face coverings for voluntary use and non-fully vaccinated employees can request N95 respirators.

Fully vaccinated employees are not required to wear face coverings in our workplace. We will not prevent any employee from wearing a face covering when it is not required unless it would create a safety hazard, such as interfering with the safe operation of equipment.

Employees required to wear face coverings in our workplace may remove them under the following conditions:

- When an employee is alone in a room or a vehicle.
- While eating or 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 feasible.

Engineering controls

For indoor locations, using Appendix B where relevant, we identify and evaluate how to maximize, to the extent feasible, ventilation with outdoor air using the highest filtration efficiency compatible with our existing building ventilation systems. We also determine the feasibility of using portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems to improve ventilation, in a manner that does not increase the risk of COVID-19 transmission. Each building at different locations is unique in its ventilation design and engineering control strategies vary by building.

Cleaning and disinfecting

We implement the following cleaning and disinfection measures for frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, phones, headsets, and bathroom surfaces.

Facility services is responsible for daily cleaning of public areas and restrooms in the buildings including common touch surfaces.

Departments are responsible for routine cleaning of areas and equipment they maintain. All employees are encouraged to clean their personal workspace surfaces and shared equipment on a daily basis or after use.

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

- If a COVID-19 case has been in the workplace during their high-risk exposure period (the two days prior to symptom onset or a positive COVID-19 test), then the areas, material, and equipment used by the person will be disinfected unless the areas, material, or equipment can be isolated from use for 24 hours.
- Disinfection will be performed by custodial services, or EH&S (on-campus location) using approved disinfectants.

Hand Hygiene

To implement effective hand hygiene procedures, we:

- Encourage and allow time for employees to wash hands with liquid soap and warm water for at least 20 seconds at hand sinks available in restrooms, break rooms, labs, and other areas where sinks are present and stocked with supplies.
- Encourage the use of hand sanitizers after washing hands, or as a substitute in the

absence of available sinks.

Investigating and Responding to COVID-19 Cases

We have developed effective procedure 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 or via information received in the course of investigating employee exposures.

We also ensure the following is implemented:

- Employees that had a close contact are offered COVID-19 testing through UHS at no cost during their working hours, excluding:
 - Employees who were fully vaccinated before the close contact and do not have symptoms.
 - 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 employees.
- Written notice within one day of 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 at the worksite during the high-risk exposure period. These notifications must meet the requirements of T8CCR section 3205(c)(3)(B) and Labor Code section 6409.6(a)(4); (a)(2); and (c), and in a form readily understandable by employees and can be anticipated to be received by the employee.
- Information on leave, pay, benefits and work arrangements will be provided as needed.

System for Communicating

Our goal is to ensure that we have effective communication with our employees throughout this period while keeping all employees safe and engaged.

- Employees should report COVID-19 symptoms to their supervisor, or to Human Resources, including possible close contacts in the two days before symptom onset.
- Employees should report COVID-19 hazards to their supervisor, or to Human Resources 408-924-1308 or email research-foundation-compliance@sjsu.edu.
- Employees can report symptoms, possible close contacts and hazards without fear of reprisal.
- Employees with medical or other conditions that put them at increased risk of severe COVID-19 illness can request accommodations by contacting their project director and/or Human Resources.
- Employees have access to COVID-19 testing through [Santa Clara County](#) when testing is required by the Research Foundation or in the event of a COVID-19 outbreak.
- The COVID-19 hazards to which employees, including other employers and individuals

in contact with our workplace, may be exposed, what is being done to control those hazards, and our COVID-19 policies and procedures. Employee confidentiality will be maintained as required.

- COVID-19 information and other updates are provided to employees via email and our [COVID-19 Information](#) page.

Training and Instruction

We provide effective employee training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards, and how to participate in the identification and evaluation of COVID-19 hazards.
- Information regarding COVID-19-related benefits (including mandated sick and vaccination leave) 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.
- 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 washing, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using handsanitizer 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.
- The right of employees that are not fully vaccinated to request N95 respirator for voluntary use, without fear of retaliation. Employees will be provided proper training for using respirators on:
 - How to properly wear them.
 - How to perform a seal check according to the manufacturer's instructions each time a respirator is worn and the fact that facial hair can interfere with a seal.
- 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.
 - The conditions where face coverings must be worn at the workplace.
 - Employees can request face coverings and can wear them at work regardless of vaccination status and without fear of retaliation.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

Employees are required to complete COVID-19 Return to Work Guide via CSULearn to learn about safety guidelines training before returning to work in person. COVID-19 Training Roster is maintained by Human Resources.

Exclusion of COVID-19 Cases

Where we have a COVID-19 cases, we limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees that had a close contact from the workplace until our return-to-work criteria have been met, with the following exceptions:
 - Employees who were fully vaccinated before the close contact and who do not develop COVID-19 symptoms.
 - COVID-19 cases who returned to work per our return-to-work criteria and have remained free of COVID-19 symptoms, for 90 days after the initial onset of COVID-19 symptoms, or for COVID-19 cases who never developed COVID-19 symptoms, for 90 days after the first positive test.
- Continuing and maintaining an employee's earnings (as applicable per Research Foundation policy), seniority, and all other employee rights and benefits whenever demonstrated that the COVID-19 exposure is work related.
- Providing employees with information on available benefits at the time of exclusion.

Reporting, Recordkeeping, and Access

It is our policy to:

- 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.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with 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 in partnership with SJSU.

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: when 10 days have passed since the last known close contact.
- Close contact with symptoms: when the "cases with symptoms" criteria (above) have

been met, unless the following are true:

- The person tested negative for COVID-19 using a polymerase chain reaction (PCR) COVID-19 test with specimen taken after the onset of symptoms; and
 - At least 10 days have passed since the last known close contact, and
 - The person has been symptom-free for at least 24 hours, without using fever-reducing medications.
- 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. If no period is specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.

Appendix A: Identification of COVID-19 Hazards

All persons, regardless of symptoms or negative COVID-19 test results, will be considered potentially infectious. Particular attention will be paid to areas where people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not. For example: meetings, trainings, entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

Evaluation of potential workplace exposure will be to all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing stationary work.

Person conducting the evaluation: [enter name(s)]

Date: [enter date]

Name(s) of employee that participated: [enter name(s)]

Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards	Places and times	Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers	Existing and/or additional COVID-19 prevention controls

Appendix B: COVID-19 Inspections

Date: [enter date]

Name of person conducting the inspection: [enter names]

Work location evaluated: [enter information]

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Ventilation* (amount of fresh air and filtration maximized)			
Additional room air filtration*			
Administrative			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and handsanitizing solutions being used according to manufacturer instructions			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			

*Identify and evaluate how to maximize ventilation with outdoor air; the highest level of filtration efficiency compatible with the existing ventilation system; and whether the use of portable or mounted HEPA filtration units, or other air cleaning systems, would reduce the risk of COVID-19 transmission. Review applicable orders and guidance from the State of California and local health departments related to COVID-19 hazards and prevention have been reviewed, including the CDPH Interim Guidance for Ventilation, Filtrations, and Air Quality in Indoor Environments and information specific to your industry, location, and operations. We maximize the quantity of outside air provided 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.

Appendix C: 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. Un-redacted 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.

Date: [enter date COVID-19 case – suspected/confirmed - became known to the employer]

Name of person conducting the investigation: [enter name]

Name of COVID-19 case (employee or non-employee*) and contact information: [enter information]

Occupation (if non-employee*, why they were in the workplace): [enter information]

*If we are made aware of a non-employee COVID-19 case in our workplace

Names of employees/representatives involved in the investigation: [enter information]

Date investigation was initiated: [enter information]

Locations where the COVID-19 case was present in the workplace during the high-risk exposure period, and activities being performed: [enter information]

Date and time the COVID-19 case was last present and excluded from the workplace: [enter information]

Date of the positive or negative test and/or diagnosis: [enter information]

Date the case first had one or more COVID-19 symptoms, if any: [enter information]

Information received regarding COVID-19 test results and onset of symptoms (attach documentation):
[enter information]

Summary determination of who may have had a close contact with the COVID-19 case during the high-risk exposure period. Attach additional information, including:

- The names of those found to be in close contact.
- Their vaccination status.
- When testing was offered, including the results and the names of those that were exempt from testing because:
 - They were fully vaccinated before the close contact and do not have symptoms.
 - They returned to work per our return-to-work criteria and have remained symptom free for 90 days or, for those that never developed symptoms, for 90 days after the initial positive test.
- The names of those that were excluded per our Exclusion of COVID-19 Cases and Employees who had a Close Contact requirements.
- The names of those exempt from exclusion requirements because:
 - They were fully vaccinated before the close contact and did not develop COVID-19 symptoms.
 - They returned to work per our return-to-work criteria and have remained symptom free for 90 days or, for those that never developed symptoms, for 90 days after the initial positive test.

[enter information]

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

1. All employees who were in close contact
2. Their authorized representatives (If applicable, the notice required by Labor Code section 6409.6(a) (2) and (c))

Names of employees that were notified:	Names of their authorized representatives:	Date

Independent contractors and other employers present at the workplace during the high-risk exposure period.

Names of individuals that were notified:	Date

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]