

County of Inyo COVID-19 Prevention Procedures

<http://Inyocounty.us/cpp>



02/28/2023

Adopted by the Inyo County Board of Supervisors 3/21/2023

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I. Introduction

COVID-19 is recognized hazard in the workplace. The County of Inyo COVID-19 Prevention Procedures (hereafter CPP) are designed to reduce and control work-related exposure by County employees and volunteers to the SARS-CoV-2 virus (severe acute respiratory syndrome coronavirus 2) that causes COVID-19 (Coronavirus Disease 2019) that may occur in County workplaces. Prevention measures unique to COVID-19 are discussed in this document rather than in the Inyo County IIPP.

This plan applies to all employees and places of employment except: (a) work locations with one employee who does not have contact with other persons; (b) employees working exclusively from home; (c) employees when subject to the Inyo County Aerosol Transmissible Disease plan (<http://inyocounty.us/ATD>); and (d) employees working remotely from a location of the employee's choice and control. Nothing in this document is intended to limit more protective or stringent state, local or departmental mandates or guidance.

This document updates the established, implemented, effective, and written Inyo County CPP to the COVID-19 Prevention Non-Emergency Regulations, which took effect February 3, 2023, replacing the previous Emergency Temporary Standard (California Code of Regulations, Title 8, section 3205). We thank Cal/OSHA for the guidance at www.dir.ca.gov/dosh/coronavirus/. This update supersedes multiple memos from 2020, five previous Board-adopted CPP versions (1/4/2021, 6/21/2021, 8/03/2021, 12/01/2021, and 1/14/2022), and four rule update email blasts (2/16/22, 3/1/22, 4/2/22, and 6/23/22), and various site-specific measures over three-plus years. Updates over time have been based on investigations of COVID-19 cases, control efforts of COVID-19 hazards, County administrative decisions through discussions with Public Health/Personnel/Risk Management/Joint Labor Management Safety Committee, release of new regulations, and release of updated model COVID-19 Prevention Procedures. Communication has been key to our successes in controlling employee case counts. The most recent version of the CPP is always available at: <https://www.inyocounty.us/cpp>. A printed copy from that same url is available with up to a five-day notice from an employee's Department Head or the personnel office in Bishop or Independence. We intend to update this document annually.

II. Authority and Responsibility

The County Administrative Officer (CAO) has the ultimate authority over all safety programs, plans, and procedures. The CAO has delegated oversight, coordination, and maintenance of the CPP to the Risk Manager. Personnel receives employee self-reports of positive test results, provides those employees with information, gathers information, excludes those employees from the workplace in writing, and sends written notice to their authorized representatives. Personnel also stocks and distributes masks and self-tests for employees who qualify. Risk Management (Risk) completes the investigation, coordinates exposure control measures, manages close contact notices, interfaces with outside agencies, and performs tracking and reporting requirements. Risk also produces and distributes copies of the CPP, signage, and training materials.

Department Heads are responsible for holding supervisors and workers accountable through the implementation and enforcement of the CPP in their workplaces. Department Heads cooperate with Personnel and Risk Management through exclusion and investigation processes. Department Heads make sure supervisors and workers receive answers to their questions about the program in a language they understand. Department Heads may implement stricter protocols due to unique needs of specific locations that the protocols described in this document for a limited time. Department Heads are urged to utilize Risk Management as a

resource. Supervisors stay up to date on COVID-19 workplace hazards to which the employees under their immediate direction and control may be exposed, and they make sure their employees receive training on hazards and signage.

All employees are responsible for using safe work practices, assisting in maintaining a safe work environment, reporting hazards, and complying with all directives, policies, and procedures, as a condition of employment. An individual's behavior can compromise the health of others, as some persons may be contagious but asymptomatic; therefore, **employees are expected to practice, and will be held accountable for practicing, the measures outlined in this CPP** as well as related guidance and instruction. Employees are asked to evaluate their own symptoms before reporting to work, per 8CCR3205(c)(2)(B). Employees who test positive for COVID-19 or receive a COVID-19 diagnosis from a licensed health care practitioner are asked to self-identify themselves to Personnel without fear of reprisal, per 8CCR3205(c)(1)(A).

Employees and their authorized representatives continue to be encouraged to contribute to all parts of the prevention procedures, and their input continues to be welcomed and appreciated. Employee leaders participate in the prevention or reduction of the spread of COVID-19 by practicing good personal hygiene, maintaining social distancing when required/advised, wearing face coverings when required to do so, and by staying home when they are sick. The Joint Labor Management Health and Safety Committee has been instrumental in all messaging and updates throughout this pandemic. Anonymous comments and reports are welcome at <https://www.inyocounty.us/iipp/anonymous-hazard-report-tool>.

III. Definitions

CLOSE CONTACT:

Determination of close contact status is dependent on the size of the indoor space. The Clint Quilter Consolidated Office Building in Bishop is 42,000 square feet with nine-foot ceilings on both floors, so the indoor air space is just below the 400,000 cubic feet threshold. The Reach Hangar at the Bishop Airport is 26,000 square feet with ceilings far in excess of eleven feet, so that location exceeds 400,000 cubic feet of indoor air space, and our employees regularly visit that location to retrieve our firetruck. The Sheriff Admin/Jail building in Independence is 36,296 square feet is bifurcated but has areas with very high ceilings, causing the structure to be close to or over the 400,000 cubic feet of indoor space; however, most of the jail is covered by the Aerosol Transmissible Disease Exposure Control Plan and not the CPP. We have no other county indoor employee locations close to the 400,000 cubic feet threshold.

Therefore, for all locations subject to the CPP, except for the Reach hangar at Bishop Airport, that is, for indoor spaces of 400,000 cubic feet or fewer, **a close contact is someone who works in the same building with a COVID-19 case for a cumulative total of 15 minutes or more over a 24-hour period during a COVID-19 case's infectious period.** There is no longer a discount for being behind a door or wearing a face covering. For our one indoor airspace in excess of 400,000 cubic feet, that is, the Reach hangar, a close contact is someone who is within six feet of a COVID-19 case for a cumulative total of 15 minutes or more over a 24-hour period during the COVID-19 case's infectious period.

COVID-19 TEST: Means a test for SARS-CoV-2 that is (a) cleared, approved, or authorized, including in an Emergency Use Authorization (EUA) by the United States Food and Drug Administration (FDA) to detect current infection with the SARS-CoV-2 virus (e.g., a viral test); (b) administered in accordance with the authorized instructions. To meet the return-to-work criteria, a COVID-19 test may be both self-administered and self-read only if another means of independent verification of the results can be provided (e.g., a time-stamped photo of the results

with a cell phone or a video chat with Personnel of the test administration and/or reading). This rule is subject to modification at any time.

COVID-19 CASE: Means a person who (a) has a positive COVID-19 test; or (b) has a positive COVID-19 diagnosis from a licensed health care provider; or (c) is subject to a COVID-19 related order to isolate issued by a local or state health official; or (d) has died due to COVID-19 in determination of a local health department official. Personnel may require independent verification of self-administered and self-read COVID-19 tests.

COVID-19 HAZARD: Means 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, or sneezing, or from procedures performed on persons which may aerosolize saliva or respiratory tract fluids.

COVID-19 SYMPTOMS: Means fever of 100.4 degrees Fahrenheit or higher, 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, unless a licensed health care professional determines the person's symptoms were caused by a known condition other than COVID-19.

IV. Communications, Rights, and Protections

Inyo County is committed to communicating information about COVID-19 hazards, policies, and procedures to employees and other persons who may come into contact with employees on work time. In addition to this CPP and distribution of its multiple versions over time, the County has communicated via email blasts, virtual meetings, posted signage, online training assignments, and COVID-19 updates at meetings of the County Board of Supervisors. Employees continue to be encouraged to contribute to the prevention procedures, and their input continues to be welcomed and appreciated. Continued contributions from the Joint Labor Management Health and Safety Committee, the Inyo County Public Health Department, Risk Management, and the Personnel Department have been instrumental in updating messaging and this written program throughout this pandemic. If you see them, please thank them.

If testing is required/advised of an employee, the employee will receive a telephone call, email and/or letter with instructions regarding how to obtain that testing. Test kits are available for employees from Personnel with priority going to those in exposed groups.

While at work, you may ask whether someone is vaccinated in order to assess your own risk, but you may not share that information with anyone else. The person may decline to answer. You may **not** ask the purpose or reason behind a coworker's decision to be or not to be vaccinated. Disciplinary and discriminatory actions, including harassment or bullying, are not permitted regarding vaccination status, testing, the wearing of face coverings, or the practice of social distancing. The protection includes vaccinated, unvaccinated, and those who decline to state their vaccination status.

Personally identifying information and medical records of COVID-19 cases or persons with COVID-19 symptoms are kept confidential by County Administration unless disclosure is required or permitted by law. Un-redacted information on COVID-19 cases is provided to the local health department, CDPH, Cal/OSHA, and NIOSH upon request when required by law.

Inyo County is an equal opportunity employer. In accordance with the requirements of Title I of the Americans with Disabilities Act ("ADA") and the California Fair Employment & Housing Act ("FEHA"), Inyo County does not discriminate on the basis of disability in recruiting, selecting or

hiring applicants for employment, or in the terms and conditions of employment. The County complies with all regulations promulgated by the US Equal Employment Opportunity Commission (“EEOC”) and the California Department of Fair Employment and Housing (“DFEH”), including providing reasonable accommodations for applicants and employees as required thereunder. All employment decisions are based on the merits of the situation in accordance with defined criteria, not the disability of the individual.

Reasonable accommodation is available to any disabled employee, where their disability affects the performance of essential job functions, and the accommodations may be implemented without undue burden on County operations. Employees with medical or other conditions that put them at increased risk of severe COVID-19 illness can request accommodations by contacting the [County ADA Coordinator](#) at 760.872.2908.

Department Heads keep up to date with applicable orders and specific guidance related to COVID-19 hazards and prevention from Risk Management, Personnel, CDPH, and Cal/OSHA, and they share that information with employees via two-way communications. Inyo County is proud of its commitment to employee safety.

V. Identification and Evaluation of COVID-19 Hazards

Inyo County has implemented procedures to identify, evaluate, and correct hazards that could increase the COVID-19 exposure potential to employees in our workplaces. We continue to consider all persons regardless of symptoms, vaccination status, or negative COVID-19 test results as potentially infectious; and we advise our employees to act accordingly. COVID-19 is treated as an airborne infectious disease. Applicable State of California and Inyo County Public Health orders and guidance are reviewed when determining measures to prevent transmission and identifying and correcting COVID-19 hazards. COVID-19 prevention controls include remote work, physical distancing, reducing population density indoors, moving indoor tasks outside, implementing separate shifts and/or break times, restricting access to work areas, enhanced cleaning schedules, temporarily increased air purification device use, and more.

Based on recent experience, these questions tend to be the most useful to these reviews:

- A. What new COVID-19 hazards have occurred?
- B. Is anyone masking in the building?
- C. When was the last training on CPP?
- D. Is our current COVID leave practice sufficient?
- E. Are employees encouraged to remain home when sick, even after the first five days?
- F. How easier is it for employees to get tested for COVID?
- G. Should we move client visits from indoor to outside (weather permitting)?
- H. Are we getting enough outdoor air circulated through indoor working areas?

We have tools to assist in this process, such as “Appendix A: COVID-19 Hazard Identification form,” and “Appendix B: COVID-19 Inspections,” though the forms themselves are not required so long as the effects are made. Unsafe and unhealthy work conditions, practices, or practices are documented and corrected in a timely manner based on the severity of the hazards identified. Individuals who identify gaps in controls that can correct those controls immediately should do so. If corrections could adversely involve coworkers, then the chain of command should be consulted. Other corrections will follow the work order system, and Risk should be notified for additional assessment and follow-up.

VI. Training and Instruction

We endeavor to provide effective training and instruction. To do so, we use many learning modalities and techniques, including signage, webinars, online training assignments, emails, and posters that are readily and frequently shared with employees. Anonymous and employee feedback and hazard identification are used to modify our training methods to improve delivery. As COVID-19 roared through year three, people have gotten very tired of hearing about COVID, and this made it difficult to spread the word. We did not do in-person training during the pandemic in order to avoid creating COVID-19 exposures in so doing, so most training has been via email, online, and one-on-one as needed. We hope to resume in-person training so we can use "Appendix D: COVID-19 Training Roster."

The CPP has included over time all the updated training and instruction needed to educate employees on this workplace hazard, how their employer is trying to protect them, and how they can protect themselves. Every time we updated the CPP, the newest version was sent out to all employees. Major revisions were sent with acknowledgement requirements through our online portal. New employees take a version of the material called "Self-Monitoring Guidance" through our learning management system. When employees get a new job with different COVID hazards, their supervisor trains them on how to protect themselves from the new hazards, just like any other new hazard (see IIPP). When new COVID hazards are introduced into, or previously unrecognized hazards are identified in, the workplace, additional training is shared with the applicable employees.

Employees are urged to note these special points, which are explained throughout this CPP:

- Do not come to work if you are sick.
- You are asked to report your positive test result to Personnel at 760.878.0377.
- Wear face coverings when required to do so.
- Face coverings are available for free to employees for use while working regardless of vaccination status and without fear of retaliation.
- Instruction on how to use a face covering properly is available.
- Respirators such as N95s are more effective at preventing COVID-19, an airborne illness.
- If you wish to wear an N95, proper fit is important, and facial hair interferes with the seal.
- Free COVID-19 self-tests are available from Personnel to employees in exposed groups.
- Employees are encouraged to participate in identification of COVID-19 hazards.
- Employees can get information regarding COVID-19-related benefits to which they may be entitled under applicable federal, state, or local laws, including workers' compensation, from Personnel at 760.878.0377. COVID cases are sent this information.
- COVID-19 is an infectious disease that can be spread through the air.
- A person infected with COVID-19 may have no symptoms.
- Particles containing the virus can travel more than six feet in smaller indoor spaces, so multiple protective techniques may be used to maximize one's protection from the virus.
- Frequent hand washing with soap and water for at least 20 seconds is important because you can move an infectious particle that you picked up on your hands to your face, nose, or mouth and thereby infect yourself.

VII. Procedures for Investigating & Responding to COVID-19 in the Workplace

Our deployed and effective practices that have been maintained depending on worksite and severity of case counts in the area to prevent transmission of COVID-19, especially by persons who had close contacts, include remote work, physical distancing, reducing population density indoors, moving indoor tasks outside, implementing separate shifts and/or break times, restricting access to work areas, enhanced cleaning schedules, temporarily increased air purification device use, and more. 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.

Employees and their representatives are invited to report, without fear of reprisal, COVID-19 symptoms, possible close contacts, and possible COVID-19 hazards in the workplace. Employees are asked to evaluate their own symptoms before reporting to work, and employees are asked to report positive test results or diagnosis to Personnel. Personnel receives notices of symptoms, positive test results or diagnosis, and close contacts, and then provides reporting employees with information on how to respond. Risk investigates reports of hazards in the workplace, case volumes, handling certain reporting, and coordinates enhanced responses.

Upon receiving an employee self-report of a positive COVID result or diagnosis, Personnel:

1. Asks the self-reporting employee the questions in Exhibit C. Personnel may require independent verification of self-administered and self-read COVID-19 tests.
2. Excludes the employee from the workplace following the current CDPH protocols.
3. Provides information and answers questions regarding where to get a copy of the CPP, nondiscrimination information, local public health guidance and CDPH protocols, Inyo County leave policies and leave guaranteed by contract, and benefits that may be available under FMLA, CFRA, short term disability, sick or unpaid leave, and, if applicable, workers' compensation.
4. Emails a written exclusion notice to the employee's personal and work email addresses with an electronic copy to Risk (for later stages in the process), to the employee's department head (for time away notification), and to the employee's authorized representative (per LC 6409.6). Personnel may also mail a printed copy of the notice to the employee's address on file.

Risk does the following upon receipt of a completed Exhibit C from Personnel:

Adds case to confidential log. Performs required reporting, including AB685. Determines whether threshold is met for 3205.1 or 3205.2. Distributes AB2693 notices for posting. Evaluates, adjusts, and advises on exposure controls. Continues to evaluate and address exposure over subsequent days in cooperation with Department and Personnel.

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. If Risk is notified of a second or additional COVID case/s within a worksite within 14 days, an air purifier is added to that work area, if available, and the area is scheduled for spraying with disinfecting material, and more vulnerable employees are offered additional options. See also the section on outbreaks. Our annual safety audit process, as defined in the IIPP, is also used to identify COVID-19 hazards and adequacy of signage. We may also conduct spot COVID safety audits, as we have, in the event of case counts indicating certain buildings being more susceptible to COVID spread. If removal of an employee would create undue risk to a community's health, Risk may submit a request for a waiver to Cal/OSHA in writing along with written exposure control measures to rs@dir.ca.gov to allow employees to return to work if it does not violate local or state health official orders for isolation, quarantine, or exclusion.

VIII. Testing of Close Contacts

County Administration makes COVID-19 self-test kits available at no cost, during paid time, for use by employees notified by postings or directly by telephone or in writing of a potential workplace exposure to COVID-19. Postings indicate this information. Both Personnel offices maintain stock of the self-test kits. Risk may assist in distribution. There may be other locations to obtain free COVID-19 testing, and County Administration may share this information liberally, though Personnel is the official source for such tests in the event an employee is notified of a potential exposure. If you are eligible for a test kit, please call Personnel ahead before coming to collect your kit. Kit stock may be distributed to Lone Pine, Tecopa, and Wellness Centers.

Testing is also made available weekly during outbreaks or biweekly during major outbreaks via self-test kits or referral to PCR testing locations. Locations covered by the Aerosol Transmissible Disease Exposure Control Plan (and therefore not the CPP), may have different testing administration protocols during the times and for the tasks that that plan as in effect. Returned cases (employees who have returned to work following a period of exclusion due to COVID), and those who were not exposed, are not required to be offered free tests, though Personnel may offer test kits to these employees while surplus supplies last.

Personnel provides the following information or similar, to employees who had or may have had close contact with a COVID-19 case in the workplace upon distributing COVID test kits:

This is a free self-test kit for employees from Personnel. Inyo County takes employee safety seriously. See the Covid-19 Prevention Procedures at <https://inyocounty.us/cpp>. Employees affected by a COVID-19 exposure may be eligible for certain benefits. Employees are asked to report a positive COVID test or diagnosis to Personnel. You may ask your supervisor about free masks for use at work, social distancing, and if a temporary remote work period is an option. Call Personnel at 760.878.0377 about FMLA, CFRA, short term disability, sick leave, workers' compensation, returning to work following a positive test result, or for more free tests. If you are at elevated risk for severe illness, contact the ADA Coordinator at 760.872.2908 to discuss options. If you receive a confirmed diagnosis of COVID-19, believe you contracted COVID-19 through an exposure at work, and wish to file a workers' compensation claim, then inform your supervisor and call the Employee Work Injury Illness Process Hotline at 877.215.7285 immediately. Exposure while working from home and transitory exposure such as while walking past someone in the hallway does not count as a workplace exposure. Inyo County prohibits the discrimination, harassment or retaliation of employees as described in the County handbook and posted in the Human Resources section of the County website. Thank you for doing your part by monitoring yourself for signs and symptoms of COVID, not coming into work if you are sick, and respecting the dignity and privacy of your coworkers.

IX. Notice of COVID-19 Cases

County employees and independent contractors who had a close contact, as well as any other employer in one of our buildings who had an employee in one of our buildings who had a close contact, will be notified as soon as possible and within the time required. Our primary method is by posting AB2693 notices, which stay up for 14 days. Communications try to avoid revealing the identity of the COVID case, though this is difficult in small spaces in a small community. There is a form in the appendix that may be used for documentation purposes of notifications. To date, such documentation has been maintained in a spreadsheet controlled by Risk Management, entitled "COVID NOTICE CHART – ONGOING," and related documentation in related electronic folders, also maintained by Risk Management. Notices comply with Labor Code section 6409.6 and AB2693.

X. Face Coverings

We provide clean, undamaged face coverings and ensure employees wear them properly over the nose and mouth during outbreak periods and when required to wear them when required by a CDPH regulation or order. This includes spaces within vehicles when a CDPH regulation or order requires face coverings indoors. When face coverings are required, they are required regardless of vaccination or test result status.

Supervisors hold employees accountable for properly wearing face coverings when and where required. No person can be prevented from, or discriminated against for, wearing a face covering voluntarily, unless it creates a safety hazard. In the event face coverings are required for a specific work area, signage will indicate such for employees and visitors. Face coverings will be provided to any employee at no cost to that employee for use at work upon request regardless of testing, vaccinations, job description, etc.

When face coverings are required, employees may remove them under the following conditions: when the employee is alone in a room or vehicle, while eating or drinking at least six feet from others with outdoor air supply or maximized indoor air circulation, during compliance with 8CCR5144 (meaning, while wearing a higher level of respiratory protection), or while performing a specific task that cannot be completed safely while wearing a face covering for the limited time during which that task is being performed. An exemption may also apply to those persons for whom wearing a face covering may pose a medical or communication difficulty. If this is the case, see Risk Management for an accommodation of an alternative face covering option or another alternative.

XI. Respirators

Respirators will be provided for voluntary use to employees who request them and who are working indoors or in vehicles with more than one person. Employees who request respirators for voluntary use will be encouraged to use them, provided with a respirator of the correct size, and will receive training. The training will include how to properly wear the respirator provided, how to perform a seal check according to the manufacturer's instructions each time a respirator is worn, and the fact that facial hair interferes with a seal. The requirements of CCR title 8 section 51449(c)(2) will be complied with according to the type of respirator (disposable filtering face piece or elastomeric re-usable) provided to employees.

XII. Ventilation

The amount of outside air inside county buildings is maximized with economizers to the extent feasible, unless there is poor outside air quality (an AQI of 100 or higher for any pollutant) or some other hazard to employees such as excessive heat or excessive cold. Employees are advised to keep windows open when safe to do so in buildings with natural ventilation. Mechanical air systems are checked regularly, and air filters are changed at least as frequently as manufacturer recommendations. Where appropriate, outdoor and air dampers have been fully opened, and recirculation dampers have been closed to reduce or eliminate air recirculation. Filtration has been improved in mechanical systems to the highest-level compatible with the existing systems (currently MERV 8 is the highest our newer systems can accommodate), and HVAC systems run as continuously as possible. We have requested that our landlords comply with the newest regulations, and Public Works assists our landlords in so

doing to the extent allowed. Indoor ventilation works best in combination with other controls described in this section. During outbreaks, portable HEPA filtration units will be temporarily used to improve air quality. Risk Management has these units for temporary deployment. Please return them at the conclusion of the outbreak.

In addition, we do the following for our indoor workplaces:

- Review CDPH and Cal/OSHA guidance regarding ventilation, including the CDPH Interim Guidance for Ventilation, Filtration, and Air Quality in Indoor Environments. Inyo County will develop, implement, and maintain effective methods to prevent transmission of COVID-19, including one or more of the following actions to improve ventilation:
 - Maximize the supply of outside air to the extent feasible, except when the United States Environmental Protection Agency (EPA) Air Quality Index is greater than 100 for any pollutant or if opening windows or maximizing outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.
 - In buildings and structures with mechanical ventilation, filter circulated air through filters at least as protective as Minimum Efficiency Reporting Value (MERV)-13, or the highest level of filtration efficiency compatible with the existing mechanical ventilation system.
 - Use High Efficiency Particulate Air (HEPA) filtration units in accordance with manufacturers' recommendations in indoor areas occupied by employees for extended periods, where ventilation is inadequate to reduce the risk of COVID-19 transmission.
- Determine if our workplace is subject to CCR, Title 8 section 5142 Mechanically Driven Heating, Ventilating and Air Conditioning (HVAC) Systems to Provide Minimum Building Ventilation, or section 5143 General Requirements of Mechanical Ventilation Systems, and comply as required.

In vehicles, we will maximize the supply of outside air to the extent feasible, except when doing so would cause a hazard to employees or expose them to inclement weather.

XIII. Reporting, Recordkeeping, and Access

Personnel and Risk Management keep their own sets of records and tracking data related to employee COVID cases and share with the local health department or Cal/OSHA whenever required by law. Risk maintains its data exclusively electronically, and Risk handles reporting in accordance with SB1159/AB685 via a digital portal designed for that purpose. Any serious illnesses or deaths of an employee occurring in our place of employment or in connection with any employment are reported immediately to Cal/OSHA per 8CCR330(h). Copies of all versions of this CPP are maintained for up to three years in an effort to document implementation of this CPP. The current version of this CPP is always available at inyocounty.us/cpp. Revisions are emailed to all employees and their authorized representatives as the revisions become available and adopted. Printed copies are available from Personnel and Department Heads with up to a five-day notice. Investigation records are available to employees and their authorized representatives subject to redacting information where required by law.

XIV. COVID-19 Outbreaks

This section is triggered (goes into effect) for all the employees in one of our buildings, except for the Quilter Consolidated Office Building, when Risk discovers three or more employee COVID-19 cases had visited the building during their infectious periods within the same 14-day period. This section is triggered for the Quilter Consolidated Office Building when Risk discovers eight or more employee COVID-19 cases had visited the building during their infectious periods within the same 14-day period. These calculations comply with 8CCR3205.1 across all county worksites and buildings in consideration of cubic feet of space and simultaneous employee occupancy. This section continues to apply until there are one or fewer new cases in same building for a 14-day period. Risk will remove signage and notify Department Heads of the affected building when this section and its special rules no longer apply. Department Heads may communicate the good news to their staff. The CAO may begin outbreak protocols prior to reaching a stated trigger to help avoid an outbreak.

COVID-19 Testing: We immediately provide COVID-19 testing available at no cost to our employees within the exposed group, regardless of vaccination status, during employees' paid time, except for returned cases and employees who were not present at the workplace during the relevant 14-day period(s). Additional testing is made available on a weekly basis to all employees in the exposed group who remain at the workplace. Employees who had close contacts will have a negative COVID-19 test taken within three to five days after the close contact or will be excluded and follow our return-to-work requirements starting from the date of the last known close contact.

Face Coverings: Employees in the exposed group, regardless of vaccination status, will wear face coverings when indoors, or when outdoors and less than six feet from another person, unless one of the exceptions in our CPP applies.

Respirators: Employees will be notified of their right to request and receive a respirator for voluntary use, as stipulated in our CPP.

COVID-19 investigation, review, and hazard correction: Inyo County will perform a review of potentially relevant COVID-19 policies, procedures, controls. Inyo County will implement changes as needed to prevent further spread of COVID-19 when this section initially applies and periodically thereafter. The investigation, review, and changes will be documented and include investigation of new or unabated COVID-19 hazards, such as leave policies and practices, whether employees are discouraged from remaining home when sick, COVID-19 testing policies, ventilation supply, and sufficiency of physical distancing.

Review updated every 30 days that CCR, Title 8 section 3205.1 continues to apply in response to new information or to new or previously unrecognized COVID-19 hazards, and when otherwise necessary. Any changes implemented to reduce the transmission of COVID-19 based on the investigation and review, which may include moving indoor tasks outdoors or having them performed remotely, increasing the outdoor air supply when work is done indoors, improving air filtration, increasing physical distancing to the extent feasible, requiring respiratory protection in compliance with our Respiratory Protection Plan, and other applicable controls.

Ventilation: Buildings or structures with mechanical ventilation will have recirculated air filtered with Minimum Efficiency Reporting Value (MERV)-13 or higher efficiency filters, if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, filters with the highest compatible filtering efficiency will be used. High Efficiency Particulate Air (HEPA) air filtration units will be used in accordance with manufacturers' recommendations in indoor areas occupied by employees for extended periods, where ventilation is inadequate to reduce the risk of COVID-19 transmission. Ventilation requirements will continue to be implemented after the outbreak has passed and CCR, Title 8 section 3205.1 is no longer applicable.

XV. Major COVID-19 Outbreaks

This section goes into effect at a worksite when it is discovered that twenty (20) or more employee COVID-19 cases in an exposed group visited the same worksite during their infectious period within a 30-day period, **unless a CDPH regulation or order defined outbreak using a different number of COVID-19 cases and/or a different time period, per 8CCR3205.2.** This section shall continue to apply until there are three or fewer COVID-19 cases detected in the exposed group for a 14-day period.

The following will be done while CCR, Title 8 section 3205.1 applies if 20 or more employee COVID-19 cases in an exposed group visited the worksite during their infectious period within a 30-day period:

- The COVID-19 testing will be required of all employees in the exposed group, regardless of vaccination status, twice a week or more frequently if recommended by Inyo County Public Health. Employees in the exposed group will be tested or excluded and follow our CPP return to work requirements. The twice a week testing requirement ends when there are three or fewer new COVID-19 cases in the exposed group for a 14-day period. We will then follow weekly testing requirement until there are one or fewer new COVID-19 cases in the exposed group for a 14-day period.
- Report the outbreak to Cal/OSHA.
- Provide respirators for voluntary use to employees in the exposed group, encourage their use, and train employees according to CCR, Title 8 section 5144(c)(2) requirements.
- Any employees in the exposed group who are not wearing respirators as required will be separated from other persons by at least six feet, except where it can be demonstrated that at least six feet of separation is not feasible, and except for momentary exposure while persons are in movement. Methods of physical distancing include:
 - Telework or other remote work arrangements.
 - Reducing the number of persons in an area at one time, including visitors.
 - Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel
 - Staggered arrival, departure, work, and break times.
 - Adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.

When it is not feasible to maintain a distance of at least six feet, individuals will be as far apart as feasible.

EXHIBITS FOLLOW

Exhibit 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, 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: _____

Date: _____

Name(s) of employee and authorized employee representative that participated: _____

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

Exhibit B: COVID-19 Inspections

This form may be used as a guide. See Risk Management for assistance specific to each location, as questions may vary depending on possible hazards.

Date: _____. Name of person conducting the inspection: _____

Work location evaluated: _____

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Filter type (MERV level)			
Portable HEPA in use?			
Administrative			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
Distancing in Use?			
PPE (not shared, is avail and being worn)			
Face Coverings in use and in force?			
N95s in use?			
Face shields/goggles?			

Exhibit C: Investigating COVID-19 Cases (v20230217/ah)

Notices to close contacts and to those who may have been exposed to the COVID-19 do not reveal personally identifying information of the COVID-19 case. If disclosure is required, names shall be redacted from this document. For more information, see Risk. Notification records are kept separate from

1. Name of COVID-19 Case, job title, and date interviewed for this form.	
2. Interviewer Name	
3. Date when COVID-19 symptoms first appeared? If asymptomatic, write N/A. Write in dates of infectious period. Infectious period is the five-day period starting from 2 days before symptoms began or starting the date of the positive test if asymptomatic.	
4. Date of positive COVID tests or diagnosis. Personnel may ask for verification if test was self-administered and self-read. Note if verification was requested and what verification was provided.	
5. Dates & work locations (including building suite #s) during infectious period that the COVID case was working (don't list working from home)	
6. Names of employees and contractors who were within 6 feet for more than 15 minutes over 24 hours at work indoors during infectious period	
7. Which of those listed in #6 were wearing face coverings during the entire interaction?	
8. Did you go to work with symptoms? Review rules if necessary.	
9. In what buildings did you work over the last 14 days (for AB685 reporting)	
10. Where have you traveled out of town in the last 2 weeks?	
11. Any known exposures to COVID-19?	
12. Where have you been when not at work in the last 14 days, such as Vons, family gatherings, games, events, rodeos, _____?	
13. Where do you think you might have gotten COVID?	
14. What the workplace conditions could have contributed to your risk of COVID-19 exposure?	
15. What could you do to reduce your COVID exposure risk?	
Explain exclusion period and benefits, answer questions, offer a copy of the CPP, and tell them you'll send them and their rep a letter.	Did you tell them all this stuff? ____ YES

Exhibit D: COVID-19 Training Roster

Date: _____ Leader: _____

Employee Name	Signature