
San Mateo County Community College District: Written COVID-19 Prevention Plan



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Scope

1. This Plan applies to all employees and places of District employment, with the following exceptions:
 - a. Work locations with one employee who does not have contact with other persons.
 - b. Employees working from home.
 - c. Employees with occupational exposure
 - d. Employees teleworking from a location of the employee’s choice, which is not under the control of the SMCCCD.
2. Nothing in this section is intended to limit more protective or stringent District, state, or local health department mandates or guidance.

Definitions.

1. **Close contact:** means being within six 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” defined by this section. This definition applies regardless of the use of face coverings. EXCEPTION: Employees have not had a close contact if they wore a respirator required by the the SMCCCD and used in compliance with section 5144, whenever they were within six feet of the COVID-19 case during the high-risk exposure period.
2. **COVID-19:** means coronavirus disease, an infectious disease caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).
3. **COVID-19 case** means a person who:
 - a. Has a positive “COVID-19 test” as defined in this section; 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 the determination of a local health department or per inclusion in the COVID-19 statistics of a county
4. **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. This also includes objects or surfaces that may be contaminated with SARS-CoV-2.

5. **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
6. **COVID-19 test:** means a viral test for SARS-CoV-2 that is:
 - a. 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
 - b. Administered in accordance with the FDA approval or the FDA Emergency Use Authorization as applicable
7. **Exposed group** means all employees at a work location, working area, or a common area at work, where an employee COVID-19 case was present at any time during the high-risk exposure period. A common area at work includes bathrooms, walkways, hallways, aisles, break or eating areas, and waiting areas. The following exceptions apply:
 - a. For the purpose of determining the exposed group, a place where persons momentarily pass through while everyone is wearing face coverings, without congregating, is not a work location, working area, or a common area at work.
 - b. If the COVID-19 case was part of a distinct group of employees who are not present at the workplace at the same time as other employees, for instance a work crew or shift that does not overlap with another work crew or shift, only employees within that distinct group are part of the exposed group.
 - c. If the COVID-19 case visited a work location, working area, or a common area at work for less than 15 minutes during the high-risk exposure period, and the COVID-19 case was wearing a face covering during the entire visit, other people at the work location, working area, or common area are not part of the exposed group. NOTE: An exposed group may include the employees of more than one the SMCCCD. See Labor Code sections 6303 and 6304.1. (8)
8. **Face covering** means a surgical mask, a medical procedure mask, a respirator worn voluntarily, or a tightly woven fabric or non-woven material of at least two layers. A face covering has no visible holes or openings and must cover the nose and mouth. A face covering does not include a scarf, ski mask, balaclava, bandana, turtleneck, collar, or single layer of fabric.
9. **Fully vaccinated** means that SMCCCD has documented that the person received, at least 14 days prior, either the second dose in a two-dose COVID-19 vaccine series or a single-dose COVID-19 vaccine. Vaccines must be FDA approved; have an emergency use authorization from the FDA; or, for persons fully vaccinated outside the United States, be listed for emergency use by the World Health Organization (WHO).
10. **High-risk exposure period:** means the following time period:
 - a. For COVID-19 cases who develop COVID-19 symptoms: from two days before they first develop symptoms until all of the following are true: it has been 10 days since after symptoms first appeared, 24 hours have passed with no fever, without the use of fever-reducing medications; and symptoms have improved.
 - b. For COVID-19 cases who never develop COVID-19 symptoms from two days before until 10 days after the specimen for their first positive test for COVID-19 was collected.

11. **Respirator:** means a respiratory protection device approved by the National Institute for Occupational Safety and Health (NIOSH) to protect the wearer from particulate matter, such as an N95 filtering facepiece respirator.
12. **Worksite:** for the limited purposes of COVID-19 prevention regulations only, means the building, store, facility, agricultural field, or other location where a COVID-19 case was present during the high-risk exposure period. It does not apply to buildings, floors, or other locations of the SMCCCD that a COVID-19 case did not enter.

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Standard Operating Procedure (SOP): System for Communication

Background

The SMCCCD values transparency in communication, both internally, and to the community. Due to the number of coronavirus disease 2019 (COVID-19) cases among select non-healthcare critical infrastructure employees across the country, the U.S. Centers for Disease Control and Prevention (CDC) is working with the SMCCCDs to ensure employees have available accurate, actionable, and timely disease prevention and control information. This communications plan shall adhere to Cal-OSHA stipulations, and align with the SMCCCD Crisis Communications Plan. The SMCCCD shall communicate to all employees the following:

- How to report COVID-19 symptoms, possible close contacts and hazards to the the SMCCCD without fear of reprisal
- COVID-19 hazards in the workplace and the SMCCCD's policies and procedures to address them (See Workspace Assessment)
- Best practices for preventing the transmission of COVID-19, including information on respirators (See PPE)
- When and how unvaccinated persons can request a respirator (See PPE)
- That employees may wear face coverings at work, regardless of their vaccination status, without fear of retaliation by their the SMCCCD (See PPE)
- How employees with elevated risk factors for COVID-19, which can be found on the CDC's website, can request accommodations from their the SMCCCD
- How the employee can obtain testing for COVID-19, such as through the the SMCCCD's workplace-based testing program, or through the local health department, a health plan, or at a community testing center (See Testing)
- Notice of potential exposure to COVID-19 (See Responding to Presence of COVID)
- How to participate in workplace hazard identification and evaluation (See Space Assessment)
- Information regarding COVID-related benefits to which the employee may be entitled under federal, state or local laws

Procedure

- I. Notifications to prevent COVID-19 Spread (How to report COVID-19 symptoms, possible close contacts and hazards to the SMCCCD without fear of reprisal)
 - a. SMCCCD shall utilize the District Public Information Officer to communicate public information
 - i. The Public Information Officer (PIO) shall notify the campus community through:
 1. Posting to the SMCCCD COVID Website
 2. District/College Wide Communications
 3. Direct personal communications through voice calls/face to face communications
 - ii. The Health Branch Director (HBD) shall inform:
 1. Possible exposures
 2. Infected personnel
 3. Communicate to those exposed (contact tracing)
 4. Communicate to the Emergency/Risk Manager any complicating factors
 - b. SMCCCD employees are required to report to their supervisor COVID-19 symptoms, possible exposures, and possible hazards at the workplace. All District occupants must conduct self-health screenings prior to entering District properties (See Health Screening).

- i. No employee/student shall be stigmatized for communicating a possible C-19 illness
 1. Supervisors are responsible for protecting their subordinates
 2. Faculty are responsible for protecting their students
 3. Retaliation for self-reporting constitutes harassment
- ii. If the employee does not want to communicate to their immediate supervisor, they may contact the HBD
- iii. Supervisors must communicate possible C-19 illnesses to the HBD
- iv. All health-related communications are bound by HIPAA privacy provisions
- v. Supervisors may inquire of vaccination status of employees
- vi. Faculty may inquire of vaccination status of their students
- vii. All conflicts in the reporting structure must be communicated to the Emergency/Risk Manager

II. Notification Procedures

a. Possible Exposures

- i. In the event of a possible exposure:
 1. Notify immediate supervisor/faculty
 2. Notify the HBD
 3. The HBD shall notify all possible personnel exposed within 48 hours
 4. The HBD shall notify all relevant parties to prevent viral spread
 5. The HBD shall notify the San Mateo County Public Health Department, Cal-OSHA, or required governing body if required
 6. The PIO shall post exposure/positive cases to the SMCCCD website
 7. Notifications to prevent spread may be delivered through digital media, voice call, email, text, and RAVE (AlertMe)
- ii. Notification of the SMCCCD COVID-19 Prevention Program
 1. All employees shall be trained on the most current health & safety protocols
 2. Training may be delivered by:
 - a. Safe Colleges and/or other approved SMCCCD platforms
 - b. Town Halls
 - c. Department specific training
 3. Training shall include:
 - a. Policies and procedures to protect employees from COVID-19 hazards and how to participate in the identification and evaluation of those hazards.
 - b. COVID-19 related benefit information, from either the SMCCCD or from federal, state or local government
 - c. The fact that COVID-19 is an infectious disease that can be spread through the air when an infectious person talks or vocalizes, sneezes, coughs, or exhales; that COVID-19 *may* be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth, although that is less common; and that an infectious person may show no symptoms.
 - d. Proper use of face coverings and the fact that face coverings are not respiratory protective equipment.

- e. The conditions under which face coverings must be worn at the workplace and that face coverings are additionally recommended outdoors for people who are not fully vaccinated if six feet of distance between people cannot be maintained.
 - f. That employees can request face coverings from the District at no cost to the employee and can wear them at work, regardless of vaccination status, without fear of retaliation. That respirators such as N95s are more effective at preventing COVID-19, an airborne disease.
 - g. The District's policies for providing respirators, and the right of employees who are not fully vaccinated to request a respirator for voluntary use, without fear of retaliation and at no cost to employees.
 - h. When respirators are provided for voluntary use, how to properly wear them and perform a seal check, and the fact that facial hair interferes with a seal.
 - i. The importance of frequent hand washing for at least 20 seconds and use of hand sanitizer when handwashing facilities are not available.
 - j. The symptoms of COVID-19 and the importance of not coming to work and getting tested if an employee has symptoms. Information on the SMCCCD's COVID-19 policies; how to access COVID-19 testing and vaccination; and the fact that vaccination is effective at preventing COVID-19, protecting against both transmission and serious illness or death.
4. Training records shall be maintained by the Office of Emergency Management (OEM) and Human Resources
 5. Discrepancies in the HSP shall be communicated to supervising personnel, and forwarded to the Emergency/Risk Manager
 6. Emergency/Risk Manager shall apply due diligence to ensure HSP is current and communicated to SMCCCD personnel through the District Public Information Officer
 7. Instructions for return to work, isolation/quarantine, and pay/benefits agreements shall be provided by the SMCCCD
- b. Procedures for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness
 - i. SMCCCD shall communicate policies and procedures that accommodate employees with medical or other conditions that put them at increased risk of severe COVID-19 illness
 - ii. Employee specific needs must be conveyed to effectuate appropriate accommodation.
 1. Accommodation requests shall be requested through the chain of supervision
 2. Accommodation requests shall be approved through Human Resources in collaboration with the District Emergency/Risk Manager
 - iii. SMCCCD will make every attempt to accommodate their employees without endangering the safety of other SMCCCD personnel.
 - iv. Accommodations may include:

1. Limiting elevator use for people with disabilities
2. Arranging modified instruction, work, or telework
3. Providing respirators and facial coverings
4. Providing sanitizers and hand cleansers
5. Providing modified facial coverings stipulated through CALOSHA
6. Providing medical counseling
7. Modifying social distance requirements for aids that are required for mobility, access, etc.

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Standard Operating Procedure (SOP): Identification and Evaluation of COVID-19 Hazards

The below requirements set forth to identify and evaluate COVID-19 Hazards are explicated throughout various standard operating procedures (SOPs) within this written prevention program. For sake of avoiding duplicating sections, the below scope will assist the reader in procuring applicable procedures within the other SOPs

Requirements:

1. The SMCCCD shall allow for employee and authorized employee representative participation in the identification and evaluation of COVID-19 hazards.
 - a. (See Workplace Assessment SOP)
2. The SMCCCD shall develop and implement a process for screening employees for and responding to employees with COVID-19 symptoms. The SMCCCD may ask employees to evaluate their own symptoms before reporting to work.
 - a. (See Health Screening SOP)
3. The SMCCCD shall 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 of COVID-19 in the workplace.
 - a. (See Responding to the Presence of COVID-19)
4. The SMCCCD shall conduct a workplace-specific identification of all interactions, areas, activities, processes, equipment, and materials that could potentially expose employees to COVID-19 hazards. SMCCCD shall treat all persons, regardless of symptoms or negative COVID-19 test results, as potentially infectious.
 - a. (See Workspace Assessment SOP)
 - i. This shall include identification of places and times when people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not, for instance during meetings or trainings and including in and around entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.
 - ii. This shall include an evaluation of employees' potential workplace exposure 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. SMCCCD shall consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing stationary work.
5. For indoor locations, the SMCCCD shall evaluate how to maximize the quantity ventilation with outdoor air, the highest level of filtration efficiency compatible with the 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 COVID-19 transmission.
 - a. (See Workspace Assessment SOP)
6. The SMCCCD shall review applicable orders and guidance from the State of California and the local health department related to COVID-19 hazards and prevention. These orders and guidance are both information of general application, including Interim guidance for Ventilation, Filtration, and Air Quality in Indoor Environments by the California Department of Public Health (CDPH), and information specific to the SMCCCD's industry, location, and operations.
 - a. (See Workspace Assessment SOP)

7. The SMCCD shall evaluate existing COVID-19 prevention controls at the workplace and the need for different or additional controls.
8. The SMCCCD shall conduct periodic inspections as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with the SMCCCDs' COVID-19 policies and procedures.
 - a. The SMCCCD Emergency/Risk Manager shall be responsible for inspecting work spaces
 - b. (See Workspace Assess SOP)

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Standard Operating Procedure (SOP): Investigating and Responding to COVID-19 Cases in the Workplace

Background

The SMCCCD shall have an effective procedure to investigate COVID-19 cases in the workplace. This includes procedures for seeking information from employees regarding COVID-19 cases and close contacts, COVID-19 test results, and onset of COVID-19 symptoms, and identifying and recording COVID-19 cases. Personal identifying information of COVID-19 cases or persons with COVID-19 symptoms, and any employee medical records required by this section, shall be kept confidential unless disclosure is required or permitted by law. Unredacted information on COVID-19 cases shall be provided to the local health department, CDPH, the Division, and immediately upon request when required by law.

- (See Responding to the Presence of COVID-19 Signs/Symptoms SOP)
- (See Reporting, Record Keeping, Access SOP)

Procedure

The SMCCCD shall take the following actions when there has been a COVID-19 case at the place of employment:

1. Determine the day and time the COVID-19 case was last present and, to the extent possible, the date of the positive COVID-19 test(s) and/or diagnosis, and the date the COVID-19 case first had one or more COVID-19 symptoms, if any were experienced.
2. Determine who may have had a close contact. This requires an evaluation of the activities of the COVID-19 case and all locations at the workplace which may have been visited by the COVID-19 case during the high-risk exposure period.
3. Within one business day of the time the SMCCCD knew or should have known of a COVID-19 case, the SMCCCD shall give written notice in a form readily understandable by employees, that people at the worksite may have been exposed to COVID-19.
 - a. The notice shall be written in a way that does not reveal any personal identifying information of the COVID-19 case.
 - b. Written notice may include, but is not limited to: personal service, email, or text message if it can reasonably be anticipated to be received by the employee within one business day of sending.
 - c. The notice shall include the disinfection plan required by Labor Code section 6409.6(a)(4). The notice must be sent to the following:
 - i. All employees at the worksite during the high-risk exposure period. If the SMCCCD should reasonably know that an employee has not received the notice, or has limited literacy in the language used in the notice, the SMCCCD shall provide verbal notice, as soon as practicable, in a language understandable by the employee.
 - ii. Independent contractors and other SMCCCDs at the worksite the high-risk exposure period.
4. Within one business day of the time the SMCCCD knew or should have known of the COVID-19 case, the SMCCCD shall provide the notice required by Labor Code section 6409.6(a)(2) and (c) to the authorized representative of any employee at the worksite during the high-risk exposure period.
5. Make COVID-19 testing available at no cost during paid time to all employees of SMCCCD who had a close contact in the workplace and provide them with the information on benefits described in subsections (c)(5)(B) and (c)(9) (c) with the following exceptions:

- a. Employees who were fully vaccinated before the close contact and do not have COVID-19 symptoms.
 - b. COVID-19 cases who returned to work pursuant to subsection 3205(c)(10)(A) or (B) 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 symptoms, for 90 days after the first positive test.
6. Investigate whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure to COVID-19 hazards.

Correction of COVID-19 Hazards

The SMCCCD shall implement effective policies and/or procedures for correcting unsafe or unhealthy conditions, and work practices in a timely manner based on the severity of the hazard.

1. (See Workplace Safety Assessment SOP)

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Facilities Response:

Facilities will respond to the work order and schedule a meeting with the requestor. As part of the site visit, Facilities will

1. Ensure that sanitization materials are provided and easily accessible
2. Review ventilation and filtration performance and adjust to increase outside air where feasible
 - a. For buildings with mechanical or natural ventilation, or both, the SMCCCD shall maximize the quantity of outside air provided to the extent feasible, with the following exemption:
 1. When the United States Environmental Protection Agency (EPA) Air Quality Index is
 - Greater than 100 for any pollutant
 - If opening windows or letting in outdoor air by other means would cause a hazard to employees (excessive heat or cold)
 2. In buildings or structures with mechanical ventilation, SMCCCD shall filter recirculated air 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, SMCCCDs shall use filters with the highest compatible filtering efficiency.
 3. SMCCCD shall also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems would reduce the risk of transmission and shall implement their use to the degree feasible
 4. If interior workspaces lack sufficient ventilation (as determined by the District Safety Officer in collaboration with Facilities), the SMCCCD may provide portable fans.
3. Provide signage that complies with current OSHA, CDC, and San Mateo County Health Department requirements
4. Install temporary plexiglass in areas deemed as high volume public interactive spaces
5. If a workspace cannot be amended to reduce COVID-19 hazards, or opening exterior windows/increasing ventilation exposes occupants to smoke or other hazards, the SMCCCD may:
 - a. Relocate employee to facility work location with improved climate controls temporarily.
 - i. Must have approval from:
 1. Supervisor
 2. Facility Manager/Director
 3. District Safety Officer
 4. College VPA and Dean
 - b. Allow for remote work (follow internal approval processes)

Evaluation of Completed Work Space Assessment

Provide Feedback: The Facilities work order system will generate an email requesting feedback and confirmation that the work was completed. Please conclude the process by submitting feedback to the Facilities team.

Standard Operating Procedure (SOP): Training and Instruction

Background

The SMCCCD values worker health and safety, and is dedicated to provided OSHA required training, instruction to reduce vulnerabilities, and general information related to COVID-19. Therefore, the SMCCCD has created training and instruction, provided on the Safecolleges platform, Townhalls, Manager Forums, and Safety Committees to include:

1. The SMCCCD's COVID-19 policies and procedures to protect employees from COVID19 hazards, and how to participate in the identification and evaluation of COVID-19 hazards.
 - a. See COVID-19 Workplace Safety Assessment SOP
2. Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws. This includes any benefits available under legally mandated sick and vaccination leave, if applicable, workers' compensation law, local governmental requirements, the SMCCCD's own leave policies, and leave guaranteed by contract, and this section
3. The fact that COVID-19 is an infectious disease that can be spread through the air when an infectious person talks or vocalizes, sneezes, coughs, or exhales; that COVID19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth, although that is less common; and that an infectious person may have no symptoms
4. The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing, face coverings, increased ventilation indoors, and respiratory protection decrease the spread of COVID-19, but are most effective when used in combination.
5. The SMCCCD's policies for providing respirators, and the right of employees who are not fully vaccinated to request a respirator for voluntary use as stated in this section, without fear of retaliation and at no cost to employees. Whenever respirators are provided for voluntary use the SMCCCD training shall include:
 - a. How to properly wear the respirator provided
 - b. 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.
6. 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.
7. Proper use of face coverings and the fact that face coverings are not respiratory protective equipment. COVID-19 is an airborne disease. N95s and more protective respirators protect the users from airborne disease while face coverings primarily protect people around the user.
8. COVID-19 symptoms, and the importance of not coming to work and obtaining a COVID-19 test if the employee has COVID-19 symptoms.
9. Information on the SMCCCD's COVID-19 policies; how to access COVID-19 testing and vaccination; and the fact that vaccination is effective at preventing COVID-19, protecting against both transmission and serious illness or death.
 - a. See Vaccination SOP
10. The conditions under which face coverings must be worn at the workplace and that face coverings are additionally recommended outdoors for people who are not fully vaccinated if six feet of distance between people cannot be maintained. Employees can request face coverings from the SMCCCD at no cost to the employee and can wear them at work, regardless of vaccination status, without fear of retaliation.

Standard Operating Procedure (SOP): Face Coverings and Personal Protective Equipment (PPE)

1. The SMCCCD shall evaluate the need for personal protective equipment to prevent exposure to COVID-19 hazards, such as gloves, goggles, and face shields, and provide such personal protective equipment as needed.
 - a. PPE requests shall be supervised by the District Emergency/Risk Manager and the Health Branch Director.
2. **Fully vaccinated employees.** No face coverings are required to be worn unless an outbreak occurs. An N95 respirator** upon request will be provided for voluntary use.
3. **Not fully vaccinated employees.** SMCCCD shall provide face coverings and ensure they are worn when indoors, or in vehicles. An N95 respirator** will be provided for voluntary use.
4. SMCCCD shall provide face coverings and ensure they are worn by employees when required by orders from the California Department of Public Health.
5. SMCCCD shall ensure that required face coverings are clean and undamaged, and that they are worn over the nose and mouth. Face shields are not a replacement for face coverings, although they may be worn together for additional protection.
6. When employees are required to wear face coverings, the following exemptions apply:
 - a. When an employee is alone in a room or vehicle
 - b. 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.
 - c. Employees wearing respirators required by the SMCCCD
 - d. 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.
 - e. Specific tasks which cannot feasibly be performed with a face covering. This exception is limited to the time period in which such tasks are actually being performed
7. Employees exempted from wearing face coverings due to a medical condition, mental health condition, or disability shall wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits it.
8. Any employee not wearing a face covering, who meets the above exceptions shall be at least six feet apart from all other persons unless the unmasked employee is either fully vaccinated or tested at least weekly for COVID-19 during paid time and at no cost to the employee. SMCCCD may not use COVID-19 testing as an alternative to face coverings when face coverings are otherwise required by this SOP.
9. The SMCCCD shall not prevent any employee from wearing a face covering when not required by this section, unless it would create a safety hazard, such as interfering with the safe operation of equipment.
10. When face coverings are not required by this SOP, SMCCCD shall provide face coverings to employees upon request, regardless of vaccination status.
11. The SMCCCD shall implement measures to communicate to non-employees the face coverings requirements on District grounds.
 - a. Face Covering Signage shall be posted in all District facilities, and all occupied District locations

** Employees will be provided instruction on proper use and care of N95 respirators. The need to replace a respirator varies with use and environment. Filtering facepiece respirators are disposable respirators that cannot be cleaned or disinfected. They must be replaced if they get damaged, deformed, dirty, or difficult to breathe through. A best practice is to replace filtering facepiece respirators at the beginning of each shift. Employers should follow the manufacturer's instructions. CDC recommends replacing an N95 after it has been taken on and off five times. Filtering facepiece respirators may not fit correctly after repeated use.

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Standard Operating Procedure (SOP): Sanitization and Hygiene

Cal-OSHA requires written prevention plans for COVID-19 to include engineering controls, administrative controls, and personal protective equipment. The following Sanitization and Hygiene SOP applies to the SMCCCD's administrative controls to mitigate the spread of COVID-19. The CDC has determined that COVID-19 is predominantly transmitted via aerosolized droplets from person to person. However, effective cleaning and disinfecting may contribute to the slowing of COVID-19 virus transmission.

1. The SMCCCD shall implement cleaning and disinfecting procedures, which require:
 - a. Identifying and regularly cleaning and disinfecting frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, phones, headsets, bathroom surfaces, and steering wheels.
 - b. The SMCCCD shall inform employees and authorized employee representatives of cleaning protocols, including the planned frequency and scope of cleaning and disinfection.
 - i. The Facilities department provides hand sanitizer and sanitizing wipes for use by campus occupants. Bulk volumes of sanitization supplies are located in community spaces for retrieval and use by campus occupants: examples include building entrances, work rooms, conference rooms, break rooms, etc.
 - ii. The District uses sanitizers and disinfects in alignment with the Environmental Protection Agency's list of Disinfectants for Use Against SARS-CoV-2 (COVID-19): <https://www.epa.gov/coronavirus/list-n-advanced-search-page-disinfectants-coronavirus-covid-19>
 - iii. At their own expense and for convenience or preference, individual employees or departments may elect to procure and/or provide their own personal containers of hand sanitizer and sanitizing wipes. If electing to provide their own hand sanitizer or disinfecting wipes, departments and individuals must use products designated as effective against COVID-19 as defined by the Center for Disease Control.
 - iv. General Sanitization Strategy:
 1. All campus community members are expected to participate in
 - a. effective hand hygiene by washing and sanitizing hands frequently
 - b. sanitizing the furniture, fixtures, and equipment they touch and use
 2. Facilities Custodians will clean and disinfect at least once daily
 - a. high use community spaces: in use classrooms, break rooms, work rooms, conference rooms, etc.
 - b. high touch points: handrails, door handles, elevator buttons, etc.
 - c. restrooms
 3. Office Occupants will clean and disinfect as needed their-
 - a. Work surface, chair arms, and equipment (phones, keyboards, etc.)
 - b. Personal possessions
 - v. COVID-19 Positive Disinfection Strategy:
 1. Cleaning of areas, material, and equipment used by a COVID-19 case during the high-risk exposure period, and disinfection if the area, material, or equipment is indoors and will be used by another employee within 24 hours of the COVID-19 case.

2. NOTE: Cleaning and disinfecting must be done in a manner that does not create a hazard to employees
- c. To protect employees from COVID-19 hazards, the SMCCCD shall evaluate its handwashing facilities, ~~determine the need for additional facilities~~, encourage and allow time for employee handwashing, and provide employees with an effective hand sanitizer. The SMCCCD shall encourage employees to wash their hands for at least 20 seconds each time. Provision or use of hand sanitizers with methyl alcohol is prohibited.
 - i. Handwashing and Hygiene signage will continue to be posted District Wide.

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Standard Operating Procedure (SOP): Reporting, Recordkeeping, and Access

Purpose

This standard operating procedure provides updated interim guidance to the Health Branch Director (HBD), for the recording of occupational illnesses, specifically cases of COVID-19. This guidance is intended to be time-limited to the current COVID-19 public health crisis. Because of the difficulty with determining work-relatedness, OSHA is exercising enforcement discretion to assess SMCCCD's efforts in making work-related determinations.

Under OSHA's recordkeeping requirements, COVID-19 is a recordable illness, and thus SMCCCD is responsible for recording cases of COVID-19, if:

1. The case is a confirmed case of COVID-19, as defined by the Centers for Disease Control and Prevention (CDC)
2. The case is work-related
3. The case involves one or more of the general recording criteria

Definitions

- 29 CFR Part 1904: Recording and Reporting Occupational Injuries and Illness
- **Note to § 1904.0:** Recording or reporting a work-related injury, illness, or fatality does not mean that the SMCCCD or employee was at fault, that an OSHA rule has been violated, or that the employee is eligible for workers' compensation or other benefits.
- 29 CFR § 1904.5: Determination of work-relatedness
- 29 CFR § 1904.7: General Recording Data

Background

COVID-19 vaccines are effective in preventing infection, disease, and spread. Unvaccinated persons are more likely to get infected and spread the virus which is transmitted through the air and concentrates indoors. About 15% of our population remains without the option for vaccination (children under 12 years old are not yet eligible) and risk for COVID-19 exposure and infection will remain until full community immunity is reached. Incidence, adaptation, and the return of the workforce—indicate that SMCCCDs take action to determine whether employee COVID-19 illnesses are work-related and thus recordable. Given the nature of the disease and ubiquity of community spread, however, in many instances it remains difficult to determine whether a COVID-19 illness is work-related, especially when an employee has experienced potential exposure both in and out of the workplace.

OSHA continues to require enforcement in order to provide certainty to SMCCCDs and workers. Accordingly, until further notice, OSHA will enforce the recordkeeping requirements of 29 CFR 1904 for employee COVID-19 illnesses for all SMCCCDs according to the guidelines below. Recording a COVID-19 illness does not, of itself, mean that the SMCCCD has violated any OSHA standard.

Procedure

[Determination of Work-Related COVID Exposures](#)

In determining whether SMCCCD has complied with this obligation and made a reasonable determination of work-relatedness, the Health Branch Director (HBD) should apply the following considerations:

- ***The reasonableness of the SMCCCD's investigation into work-relatedness.*** SMCCCD should not be expected to undertake extensive medical inquiries, given employee privacy concerns and SMCCCD's lack of expertise in this area. It is sufficient for SMCCCD, when it learns of an employee's COVID-19 illness, (1) to ask the employee how he believes he contracted the COVID-19

illness; (2) while respecting employee privacy, discuss with the employee his work and out-of-work activities that may have led to the COVID-19 illness; and (3) review the employee's work environment for potential SARS-CoV-2 exposure. The review in (3) should be informed by any other instances of workers in that environment contracting COVID-19 illness.

- ***The evidence available to the SMCCCD.*** The evidence that a COVID-19 illness was work-related should be considered based on the information reasonably available to SMCCCD at the time it made its work-relatedness determination. If SMCCCD later learns more information related to an employee's COVID-19 illness, then that information should be considered as well in determining whether SMCCCD made a reasonable work-relatedness determination.

- ***The evidence that a COVID-19 illness was contracted at work.*** The HBD should consider all reasonably available evidence, in the manner described above, to determine whether SMCCCD has complied with its recording obligation. This cannot be reduced to a ready formula, but certain types of evidence may weigh in favor of or against work-relatedness. For instance:

- COVID-19 illnesses are likely work-related when several cases develop among workers who work closely together and there is no alternative explanation.

- An employee's COVID-19 illness is likely work-related if it is contracted shortly after lengthy, close exposure to a particular customer or coworker who has a confirmed case of COVID-19 and there is no alternative explanation.

- An employee's COVID-19 illness is likely work-related if his/her job duties include having frequent, close exposure to the general public in a locality with ongoing community transmission and there is no alternative explanation.

- An employee's COVID-19 illness is likely not work-related if she is the only worker to contract COVID-19 in her vicinity and her job duties do not include having frequent contact with the general public, regardless of the rate of community spread.

- An employee's COVID-19 illness is likely not work-related if he, outside the workplace, closely and frequently associates with someone (e.g., a family member, significant other, or close friend) who (1) has COVID-19; (2) is not a coworker, and (3) exposes the employee during the period in which the individual is likely infectious.

- The HBD should give due weight to any evidence of causation, pertaining to the employee illness, at issue provided by medical providers, public health authorities, or the employee herself.

If, after the reasonable and good faith inquiry described above, SMCCCD cannot determine whether it is more likely than not that exposure in the workplace played a causal role with respect to a particular case of COVID-19, SMCCCD does not need to record that COVID-19 illness. In all events, it is important as a matter of worker health and safety, as well as public health, for SMCCCD to examine COVID-19 cases among workers and respond appropriately to protect workers, regardless of whether a case is ultimately determined to be work-related.

Reporting Procedure

The San Mateo County Community College District (SMCCCD) shall report information about COVID-19 cases at the workplace to the local health department whenever required by law and shall provide any related information requested by the local health department. All reporting procedures shall align with Federal, State, and County guidelines.

Employees and students are directed to immediately report through their supervisor to the Health Branch Director any serious illnesses, suspected campus exposures, death occurring on SMCCCD grounds or in connection with its direct operations.

The Health Branch Director (HBD) will perform a preliminary investigation to assess conditions of the potential exposure. The following will apply based on the variables of the suspected campus exposure:

- Notify appropriate operational personnel, including contractual notification of union bargaining units
 - Perform contact tracing following Center for Disease Control (CDC) and San Mateo County Public Health (SMCPH) guidelines and HIPPA regulations for maintaining confidentiality during process
 - Contact San Mateo County Health to report any COVID-19 cases and obtain consultation as appropriate as required by law and regulation
 - Notify COVID-19 positive individuals with SMCPH directives for isolation
 - Notify individuals who have been determined to have risk exposure with SMCPH directives for quarantine or symptom monitoring
 - Isolation directed individuals will provide Healthcare Provider Release Documentation (HRD) prior to returning to District Grounds. Quarantine directed individuals will provide self-attestation to Health Branch Director. The following must be assessed:
 - Acknowledgement of directive for isolation (COVID+ test) or quarantine (symptomatic or confirmed exposure)
 - Completion of isolation or quarantine (beginning and ending date) consistent with CDC recommendations
 - Confirmation of no symptoms; or improved symptoms, and no fever for 24 hours without fever reducing medication
- A follow up negative COVID test is NOT required for release***
- The HBD shall notify appropriate supervisors or reporting staff when the individual is cleared to return to campus grounds

Record Keeping

The SMCCCD shall maintain records of the steps taken to implement the written COVID-19 Prevention Program. The written COVID-19 Prevention Program shall be made available at the workplace to employees, authorized employee representatives, and to representatives of the District immediately upon request. The Health Branch Director is responsible for maintaining records and keeping track of all COVID-19 cases in alignment with HIPPA regulations.

- Confidentiality is maintained and information is discussed and shared consistent with HIPPA regulations
- Documentation of COVID-19 cases is maintained through the District's PYRAMED medical record platform and includes the following information
 - Employee's name
 - Contact information
 - Occupation
 - Location where the employee worked
 - Date of the last day at the workplace
 - Date of a positive COVID-19 test
 - Notes specific to case conditions
- The district maintains a webpage that reports confirmed positive cases of COVID-19 in individuals who were on SMCCCD property and where an individual was on campus within the last work week and was required to isolate or quarantine due to possible COVID-19 exposure. Cases are updated on a weekly basis: <https://covid-19.smccd.edu/exposures-report/>

Record Access

Medical record access is available following HIPPA regulations. Information shall be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

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Standard Operating Procedure (SOP): Return to Work SOP

1. COVID-19 cases with COVID-19 symptoms shall not return to work until:
 - a) At least 24 hours have passed since a fever of 100.4 degrees Fahrenheit or higher has resolved without the use of fever-reducing medications; and
 - b) COVID-19 symptoms have improved; and
 - c) At least 10 days have passed since COVID-19 symptoms first appeared.
2. COVID-19 cases who tested positive but never developed COVID-19 symptoms shall 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.
3. A negative COVID-19 test shall not be required for an employee to return to work.
4. Persons who had a close contact may return to work as follows:
 - a) Persons who had a close contact but never developed any COVID-19 symptoms may return to work when 10 days have passed since the last known close contact.
 - b) Persons who had a close contact and developed any COVID-19 symptom cannot return to work until the requirements of subsection (c)(10)(A) have been met, unless all of 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.
 - c) During critical staffing shortages, when there are not enough staff to provide safe patient care, essential critical infrastructure workers in the following categories may return after Day 7 from the date of last exposure if they have received a negative PCR COVID-19 test result from a specimen collected after Day 5:
 - Health care workers who did not develop COVID-19 symptoms;
 - Emergency response workers who did not develop COVID-19 symptoms; and
 - Social service workers who did not develop COVID-19 symptoms and who work face to face with clients in child welfare or assisted living.
5. If an order to isolate, quarantine, or exclude an employee is issued by a local or state health official, the employee shall not return to work until the period of isolation or quarantine is completed or the order is lifted.
6. If no violations of local or state health officer orders for isolation, quarantine, or exclusion would result, the Division may, upon request, allow employees to return to work on the basis that the removal of an employee would create undue risk to a community's health and safety. In such cases, the SMCCCD shall develop, implement, and maintain effective control measures to prevent transmission in the workplace including providing isolation for the employee at the workplace and, if isolation is not feasible, the use of respirators in the workplace.

Standard Operating Procedure (SOP): Multiple COVID-19 Infections and COVID-19 Outbreaks.

Scope

This section applies to a workplace which has been identified as a location where there are three or more employee COVID-19 cases visited the workplace during their high-risk exposure period at any time during a 14-day period.

Procedure

1. COVID-19 Testing
 - a. The SMCCCD shall make COVID-19 testing available at no cost to its employees within the exposed group, during employees' paid time, except:
 - i. Employees who were not present at the workplace during the relevant 14 day period(s)
 - ii. Employees who were fully vaccinated and who do not have COVID-19 symptoms.
 - b. COVID-19 testing shall consist of the following:
 - i. Testing shall be made available to all employees in the exposed group and then again one week later. Negative COVID-19 test results of employees with COVID-19 exposure shall not impact the duration of any quarantine, isolation, or exclusion period required by, or orders issued by, the local health department.
 - ii. The SMCCCD shall make COVID-19 testing available once a week at no cost, during paid time, to all employees in the exposed group who remain at the workplace, or more frequently if recommended by the local health department.
 - c. The SMCCCD shall make additional testing available at no cost to employees, during employees' paid time, when deemed necessary by the District through the Issuance of Order to Take Special Action, in accordance with title 8, section 332.3 of CAL-OSHA.
2. The SMCCCD shall give notice to employees in the exposed group of their right to request a respirator for voluntary use, if they are not fully vaccinated.
3. The SMCCCD shall evaluate whether to implement physical distancing of at least six feet between persons or, where six feet of physical distancing is not feasible, the use of cleanable solid partitions of sufficient size to reduce COVID-19 transmission.
4. The SMCCCD shall immediately perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19. The investigation and review shall be documented and include:
 - a. Investigation of new or unabated COVID-19 hazards including the SMCCCD's leave policies and practices and whether employees are discouraged from remaining home when sick; the SMCCCD's COVID-19 testing policies; insufficient outdoor air; insufficient air filtration; and lack of physical distancing.
 - b. The review shall be updated every 30 days that this section continues to apply, in response to new information or to new or previously unrecognized COVID-19 hazards, or when otherwise necessary.
 - c. The SMCCCD shall implement changes to reduce the transmission of COVID-19 based on the investigation and review. The SMCCCD shall consider moving indoor tasks outdoors or having them performed remotely, increasing outdoor air supply when work is done indoors, improving air filtration, increasing physical distancing as much as feasible,

requiring respiratory protection in compliance with section 5144, and other applicable controls.

5. In buildings or structures with mechanical ventilation, the SMCCCD shall filter recirculated air 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, the SMCCCD shall use filters with the highest compatible filtering efficiency. SMCCCDs shall also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units or other air cleaning/ventilation systems would reduce the risk of transmission and, if so, shall implement their use to the degree feasible.

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Standard Operating Procedure (SOP): Major COVID-19 Outbreaks

Scope

This SOP applies if 20 or more employee COVID-19 cases in an exposed group visited the workplace during their high-risk exposure period within a 30-day period, and shall apply until there are fewer than three COVID-19 cases detected in the exposed group for a 14-day period.

Procedure

1. The SMCCCD shall provide a respirator for voluntary use to employees in the exposed group and shall determine the need for a respiratory protection program or changes to an existing respiratory protection program.
2. Any employees in the exposed group who are not wearing respirators required by the SMCCCD shall be separated from other persons by at least six feet, except where an SMCCCD can demonstrate that 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; and 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 shall be as far apart as feasible.
3. At work stations where an employee in the exposed group is assigned to work for an extended period of time, such as cash registers, desks, and production line stations, and where the physical distancing requirement is not maintained at all times, the SMCCCD shall install cleanable solid partitions that effectively reduce transmission between the employee and other persons.
4. The SMCCCD shall evaluate whether to halt some or all operations at the workplace until COVID-19 hazards have been corrected.

Standard Operating Procedure (SOP): Prevention in SMCCCD-Provided Housing

Scope

This section applies to SMCCCD-provided housing. SMCCCD-provided housing is any place or area of land, any portion of any housing accommodation, or property upon which a housing accommodation is located, consisting of: living quarters, dwelling, boardinghouse, tent, bunkhouse, maintenance-of-way car, mobile home, manufactured home, recreational vehicle, travel trailer, or other housing accommodations. SMCCCD provided housing includes a “labor camp” as that term is used in title 8 of the California Code of Regulations or other regulations or codes. The SMCCCD-provided housing may be maintained in one or more buildings or one or more sites, including hotels and motels, and the premises upon which they are situated, or the area set aside and provided for parking of mobile homes or camping. SMCCCD-provided housing is housing that is arranged for or provided by SMCCCD, other person, or entity to workers, and in some cases to workers and persons in their households, in connection with the workers' employment, whether or not rent or fees are paid or collected.

Procedure

1. Assignment of housing units--To the extent feasible, SMCCCD shall reduce exposure to COVID-19 hazards by assigning employee residents to distinct groups and ensuring that each group remains separate from other such groups during transportation and work. SMCCCD shall ensure that shared housing unit assignments are prioritized in the following order:
 - a. Residents who usually maintain a household together outside of work, such as family members, shall be housed in the same housing unit without other persons.
 - b. Residents who work in the same crew or work together at the same workplace shall be housed in the same housing unit without other persons
 - c. Employees who do not usually maintain a common household, work crew, or workplace shall be housed in the same housing unit only when no other housing alternatives are feasible.
2. In housing units, SMCCCD shall maximize the quantity and supply of outdoor air and increase filtration efficiency to the highest level compatible with the existing ventilation system. If there is not a Minimum Efficiency Reporting Value (MERV) 13 or higher filter in use, portable or mounted High Efficiency Particulate Air (HEPA) filtration units shall be used, to the extent feasible, in all sleeping areas in which there are two or more residents who are not fully vaccinated.
3. SMCCCD shall provide face coverings to all residents and provide information to residents on when they should be used in accordance with state or local health officer orders or guidance.
4. SMCCCD shall ensure that housing units, kitchens, bathrooms, and common areas are effectively cleaned to prevent the spread of COVID-19. Housing units, kitchens, bathrooms, and indoor common areas shall be cleaned and disinfected after a COVID-19 case was present during the high-risk exposure period, if another resident will be there within 24 hours of the COVID-19 case. Cleaning and disinfecting shall be done in a manner that protects the privacy of resident, as it will be the resident's responsibility to clean their dwelling.
5. The SMCCCD shall instruct residents not to share unwashed dishes, drinking glasses, cups, eating utensils, and similar items.
6. The SMCCCD shall encourage residents to report COVID-19 symptoms
7. The SMCCCD shall effectively quarantine COVID-19 exposed residents who have had a close contact from all other residents. Effective quarantine shall include providing exposed residents

who had a close contact with a private bathroom, and sleeping area. The following residents are exempt from this requirement:

- a. Fully vaccinated residents who do not have COVID-19 symptoms; and
 - b. COVID-19 cases who 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.
8. The SMCCCD shall effectively isolate COVID-19 cases from all residents who are not COVID-19 cases. Effective isolation shall include housing COVID-19 cases only with other COVID-19 cases, and providing COVID-19 case residents with a sleeping area, and bathroom that is not shared by non-COVID-19 case residents.
 9. Personal identifying information regarding COVID-19 cases and persons with COVID19 symptoms shall be kept confidential in accordance with subsection

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Standard Operating Procedure (SOP): COVID-19 Prevention in Employer-Provided Transportation

Scope

This section applies to employer-provided motor vehicle transportation, which is any transportation of an employee, during the course and scope of employment, including transportation to and from different workplaces, jobsites, delivery sites, buildings, stores, facilities, and agricultural fields, provided, arranged for, or secured by an employer regardless of the travel distance or duration involved. The following exceptions apply:

- This section does not apply if the driver and all passengers are from the same household outside of work, such as family members, or if the driver is alone in the vehicle
- This section does not apply to employer-provided transportation when necessary for emergency response, including firefighting, rescue, and evacuation, and support activities directly aiding response such as utilities, communications, and medical operations
- This section does not apply to vehicles in which all employees are fully vaccinated.
- This section does not apply to public transportation.

Procedure

1. To the extent feasible, the SMCCCD shall reduce exposure to COVID-19 hazards by assigning employees sharing vehicles to distinct groups and ensuring that each group remains separate from other such groups during transportation, during work activities, and in employer-provided housing. Employers shall prioritize shared transportation assignments in the following order:
 - a. Employees residing in the same housing unit shall be transported in the same vehicle.
 - b. Employees working in the same crew or workplace shall be transported in the same vehicle.
 - c. Employees who do not share the same household, work crew or workplace shall be transported in the same vehicle only when no other transportation alternatives are feasible.
2. Face Coverings must be used by non-vaccinated employees according to the CAL-OSHA ETS standards.
3. No employee shall use a department vehicle if they are exhibiting signs/symptoms of COVID-19
4. Cleaning:
 - a. All high-contact surfaces (door handles, seatbelt buckles, armrests, etc.) used by passengers are cleaned to prevent the spread of COVID-19 and must be cleaned and disinfected if used by a COVID-19 case during the high-risk exposure period, when the surface will be used by another employee within 24 hours of the COVID-19 case.
 - b. All high-contact surfaces used by drivers, such as the steering wheel, armrests, seatbelt buckles, door handles and shifter, shall be cleaned to prevent the spread of COVID-19 between different drivers and are disinfected after use by a COVID-19 case during the high-risk exposure period, if the surface will be used by another employee within 24 hours of the COVID-19 case.
 - c. The SMCCCD shall provide sanitizing materials to employees, and supervisors shall ensure vehicles are cleaned regularly.
5. Ventilation:
 - a. The SMCCCD shall ensure that vehicle windows are kept open, and the ventilation system set to maximize outdoor air and not set to recirculate air. Windows do not have to be kept open if one or more of the following conditions exist:

- i. The vehicle has functioning air conditioning in use and excessive outdoor heat would create a hazard to employees.
- ii. The vehicle has functioning heating in use and excessive outdoor cold would create a hazard to employees
- iii. Protection is needed from weather conditions, such as rain or snow
- iv. The vehicle has a cabin air filter in use and the U.S. EPA Air Quality Index for any pollutant is greater than 100

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