COVID-19 Prevention Program (CPP)

Date: August 2, 2021

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

Authority and Responsibility

Tanya Krause, Superintendent, has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

All employees are responsible for using safe work practices, following all directives, policies and procedures, and assisting in maintaining a safe work environment.

Identification and Evaluation of COVID-19 Hazards

We implement the following in our workplace:

- Document the vaccination status of our employees by using Appendix E: Documentation of Employee COVID-19 Vaccination Status, which is maintained as a confidential medical record.
- Evaluate employees’ potential workplace exposures to all persons at, or who may enter, our workplace.
- Develop COVID-19 policies and procedures to respond effectively and immediately to individuals at the workplace who have been diagnosed with COVID-19, and to be able to reduce the risk of transmission in the workplace.
- Review applicable orders along with general and industry-specific guidance from the State of California, Cal/ OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention protocols in our workplace and the need for different or additional protocols.
- Conduct periodic inspections using the Appendix B: COVID-19 Inspections form as needed to identify and evaluate unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.
Employee Participation

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

* Applying Federal, State, and Local resources for office space return to work guidelines.
* Reviewing COVID -19 Procedures and Protocols between supervisors and employees
* Scotts Valley Unified School District Inspections team (consisting of the Chief Business Official and the Director of Maintenance and Operations) has conducted walk-throughs of Brook Knoll Elementary, Vine Hill Elementary, Scotts Valley Middle School, Scotts Valley High School, Food Service facilities, and the District Office.
* The Maintenance and Operations Department has modified work spaces to be in compliance with COVID-19 safety precautions pursuant to safety guidelines and the injury and illness prevention plan.
* Staff Training plan has been implemented

Employee Screening

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

* Having employees self-screen prior to coming to work. This involves reviewing the following questions daily:
  • Do you have any of these symptoms that are not caused by another condition? Fever or chills, Cough, Shortness of breath or difficulty breathing, Fatigue, Muscle or body aches, Headache, Recent loss of taste or smell, Sore throat, Congestion, Nausea or vomiting, Diarrhea.
  • Within the past 10 days, have you had close physical contact with anyone who is known to have laboratory-confirmed COVID-19 test?
  • Have you had a positive COVID-19 test for an active virus in the past 10 days? Within the past 10 days, has a public health or medical professional told you to self-monitor, self-isolate, or self-quarantine because of concerns about COVID-19 infection?
  • If employees answer yes to any of the above, they cannot come to work and must inform their site administrator.
* Having touchless thermometers available at worksites for self-use.
* Displaying signage throughout all school sites reminding visitors and employees of screening and wellness protocols.

Correction of COVID-19 Hazards

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

* In an effort to maintain a safe and healthy work place during the COVID-19 pandemic, staff will use the COVID-19 Inspections form (Appendix B) to report any issues to the site administrator, who will inform the business department. A separate form will be submitted for each issue.
* Reporting an issue will not result in corrective action and no repercussions will be taken against any employee for submitting a report.

**Controls of COVID-19 Hazards**

**Face Coverings**

Prior to entering a school campus and while indoors, all employees are required to have on a face covering, worn over the nose and mouth, and employees are advised to wear a face covering outdoors if not vaccinated, and also where required by orders from the California Department of Public Health (CDPH). Employees are required to utilize a face covering while in the building at all times, unless by themselves in an enclosed office space. Employees who forget to bring a face covering will be provided one.

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

- When an employee is alone in a room or a vehicle.
- While eating or drinking at the workplace.
- Employees are required to wear respirators in accordance with our respirator program that meets section 5144 requirements.
- 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. Such employees will wear an effective, non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition permits it.
- Specific tasks that cannot feasibly be performed with a face covering. This exception is limited to the time in which such tasks are being performed.

We will not prevent any employee from wearing a face covering when it is not required unless it would create a safety hazard, such as interfering with the safe operation of equipment.

Face coverings will also be provided to any employee that requests one, regardless of their vaccination status.

**Engineering controls**

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

* Contact barriers (shields) have been installed where high frequency customer service is performed (ie. front desk and high-traffic areas).

We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by:

* Using high-efficiency particulate air (HEPA) filtration systems at all Scotts Valley Unified School District sites. These
filtration units currently meet the recommended filtration level for safe air quality in our facilities and will routinely be inspected and maintained.

* Ventilating classrooms with outside air to the greatest extent possible in order to dilute indoor airborne contaminants and decrease disease transmission rates. Employees are encouraged to open doors and windows to maintain the flow of outside air.

**Cleaning and disinfecting**

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

* Sanitization will be performed daily in high traffic areas.
* Scotts Valley Unified School District maintenance teams will only use cleaning agents that have been EPA-approved for use against SARS-CoV-2.
* Employees will be required to perform limited non-custodial cleaning and disinfecting of their own workstation and of shared items (ex. copiers, staplers, paper cutters, fridge doors, etc). The best practice is to clean items before AND after each use.
* Hand sanitizer bottles and cleaning supplies will be filled regularly, and hand soap is replenished daily.
* The high-efficiency particulate air (HEPA) filtration systems are provided at all Scotts Valley Unified School District sites.

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

* Close off areas visited by the ill person(s). Open outside doors and windows and use ventilating fans to increase air circulation in the area. Wait 24 hours or as long as practical before beginning cleaning and disinfection.
* Cleaning staff will clean and disinfect all areas used by the ill person, especially frequently touched surfaces.

**Hand sanitizing**

To implement effective hand sanitizing procedures, we:

* Post CDC handwashing guidance in all restrooms and break rooms.
* Require frequent handwashing with soap and water for a minimum of 20 seconds.
* Require the use of hand sanitizer if a sink is not in close proximity.
* Refill hand sanitizer bottles regularly, and replenish hand soap daily.

**Personal protective equipment (PPE) used to control employees’ exposure to COVID-19**

We evaluate the need for PPE (such as gloves, goggles, and face shields) as required by section 3380, and provide and ensure use of such PPE as needed.

**Testing of symptomatic employees**

COVID-19 testing is available at no cost to employees with COVID-19 symptoms who are not fully vaccinated, during
employees’ paid time.

**Investigating and Responding to COVID-19 Cases**

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

We also ensure the following is implemented:

* Offer COVID-19 testing at no cost during work hours.
* Provide information from the Human Resources Department regarding COVID-19-related benefits to which the employee may be entitled under applicable Federal, State, or Local laws.

**System for Communicating**

Our goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and that it includes the following information:

- Who employees should report COVID-19 symptoms, possible close contacts and hazards to, and how.
- That employees can report symptoms, possible close contacts and hazards without fear of reprisal.
- How employees with medical or other conditions that put them at increased risk of severe COVID-19 illness can request accommodations.
- Access to COVID-19 testing when testing is required.

Additional considerations:
* Employees should report COVID-19 symptoms, exposures and/or possible hazards to their immediate supervisors by phone as soon as possible. If you do not reach your supervisor, contact Human Resources immediately.
* Supervisor reports to:
  - Human Resources Department (Personnel)
  - Business Department (Other)
* Employees have been provided information on available COVID-19 testing locations throughout Santa Cruz County, to include the Santa Cruz County Office of Education.

**Training and Instruction**

We provide effective employee training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards, and how to participate in the identification and evaluation of COVID-19 hazards.
• Information regarding COVID-19-related benefits (including mandated sick and vaccination leave) to which the employee may be entitled under applicable Federal, State, or Local laws.
• The fact that COVID-19 is an infectious disease that can be spread through the air.
• An infectious person may have no symptoms.
• The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing, face coverings, increased ventilation indoors, and respiratory protection decrease the spread of COVID-19 and are most effective when used in combination.
• The right of employees that are not fully vaccinated to request a respirator for voluntary use, without fear of retaliation, and our policies for providing the respirators. Employees voluntarily using respirators will be trained according to section 5144(c)(2) requirements:
  o How to properly wear them.
  o How to perform a seal check according to the manufacturer’s instructions each time a respirator is worn, and the fact that facial hair can interfere with a seal.
• The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
• Proper use of face coverings and the fact that face coverings are not respiratory protective equipment. Since 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.
  o The conditions where face coverings must be worn at the workplace.
  o That face coverings are additionally recommended outdoors for people who are not fully vaccinated if six feet of distance cannot be maintained.
  o Employees can request face coverings and can wear them at work regardless of vaccination status and without fear of retaliation.
• COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
• Information on our COVID-19 policies and 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.

Keenan Safeschools will provide online trainings.

Appendix D: COVID-19 Training Roster will be used to document this training

Exclusion of COVID-19 Cases and Employees who had a Close Contact

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

• Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
• Excluding employees that had a close contact from the workplace until our return-to-work criteria have been met, with the following exceptions:
  • Employees who were fully vaccinated before the close contact and who do not develop COVID-19 symptoms.
  • COVID-19 cases who returned to work per our return-to-work criteria and have remained free of COVID-19 symptoms, for 90 days after the initial onset of COVID-19 symptoms, or for COVID-19 cases who never developed
COVID-19 symptoms, for 90 days after the first positive test.

- For employees excluded from work, continuing, and maintaining employees’ earnings, wages, seniority, and all other employees’ rights. Additionally, we provide employees at the time of exclusion with information on available benefits.

**Reporting, Recordkeeping, and Access**

It is our policy to:

- Report information about COVID-19 cases and outbreaks at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use the Appendix C: Investigating COVID-19 Cases form to keep a record of and track all COVID-19 cases.

**Return-to-Work Criteria**

- **COVID-19 cases with symptoms** will not return to work until all the following have occurred:
  - At least 24 hours have passed since a fever of 100.4 °F. or higher has resolved without the use of fever-reducing medications, and
  - COVID-19 symptoms have improved, and
  - At least 10 days have passed since COVID-19 symptoms first appeared.
- **COVID-19 cases who tested positive but never developed symptoms** will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
  - A negative COVID-19 test will not be required for an employee to return to work.
- 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.

Tanya Krause, Superintendent  
August 2, 2021
Appendix A: Identification of COVID-19 Hazards

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

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

Person Conducting the Evaluation:

Date:

Name(s) of Employees and Authorized Employee Representative that Participated:

<table>
<thead>
<tr>
<th>Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards</th>
<th>Places and times</th>
<th>Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers</th>
<th>Existing and/or additional COVID-19 prevention controls</th>
</tr>
</thead>
</table>
Appendix B: COVID-19 Inspections

Date:

Name of Person Conducting the Inspection:

Work Location Evaluated:

<table>
<thead>
<tr>
<th>Exposure Controls</th>
<th>Status</th>
<th>Person Assigned to Correct</th>
<th>Date Corrected</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Engineering</strong></td>
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<tr>
<td>Ventilation* (amount of fresh air and filtration maximized)</td>
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<tr>
<td>Additional room air filtration</td>
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<tr>
<th>Exposure Controls</th>
<th>Status</th>
<th>Person Assigned to Correct</th>
<th>Date Corrected</th>
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<tbody>
<tr>
<td><strong>Administrative</strong></td>
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<tr>
<td>Surface cleaning and disinfection (frequently enough and adequate supplies)</td>
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<tr>
<td>Hand washing facilities (adequate numbers and supplies)</td>
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<td></td>
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<tr>
<td>Disinfecting and hand sanitizing solutions being used according to manufacturer instructions</td>
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<thead>
<tr>
<th>Exposure Controls</th>
<th>Status</th>
<th>Person Assigned to Correct</th>
<th>Date Corrected</th>
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<tr>
<td><strong>PPE</strong> (not shared, available and being worn)</td>
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<tr>
<td>Face coverings (cleaned sufficiently often)</td>
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<td></td>
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<tr>
<td>Face shields/goggles</td>
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*Identify and evaluate how to maximize ventilation with outdoor air; the filtration efficiency compatible with the existing ventilation system; and whether the use of portable or mounted HEPA filtration units, or other air cleaning systems, would reduce the risk of COVID-19 transmission. Review applicable orders and guidance from the State of California and local health departments related to COVID-19 hazards and prevention have been reviewed, including the CDPH Interim Guidance for Ventilation, Filtrations, and Air Quality in Indoor Environments and information specific to your industry, location, and operations. We maximize the quantity of outside air provided to the extent feasible, except when the United States Environmental Protection Agency (EPA) Air Quality Index is greater than 100 for any pollutant or if opening windows or maximizing outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.
Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or persons with COVID-19 symptoms, and any employee required medical records will be kept confidential unless disclosure is required or permitted by law. Un-redacted information on COVID-19 cases will be provided to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH) immediately upon request, and when required by law.

Date:

Name of Person Conducting the Investigation:

Name of COVID-19 case (employee or non-employee*) and contact information:
Occupation (if non-employee*, why they were in the workplace):

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

Names of employees/representatives involved in the investigation:

Date investigation was initiated:

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

Date and time the COVID-19 case was last present and excluded from the workplace:

Date of the positive or negative test and/or diagnosis:

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

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

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

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

<table>
<thead>
<tr>
<th>Names of employees that were notified:</th>
<th>Names of their authorized representatives:</th>
<th>Date</th>
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Independent contractors and other employers present at the workplace during the high-risk exposure period.

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<tr>
<th>Names of individuals that were notified:</th>
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What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?

What could be done to reduce exposure to COVID-19?

Was local health department notified? Date?
Appendix D: COVID-19 Training Roster

Date:

Person that conducted the training:

<table>
<thead>
<tr>
<th>Employee Name</th>
<th>Signature</th>
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Appendix E: Documentation of Employee COVID-19 Vaccination Status – CONFIDENTIAL

<table>
<thead>
<tr>
<th>Employee Name</th>
<th>Fully or Partially Vaccinated1</th>
<th>Method of Documentation2</th>
</tr>
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</table>

1Update, accordingly and maintain as confidential medical record
2Acceptable options include:
- Employees provide proof of vaccination (vaccine card, image of vaccine card or health care document showing vaccination status) and employer maintains a copy.
- Employees provide proof of vaccination. The employer maintains a record of the employees who presented proof, but not the vaccine record itself.
- Employees self-attest to vaccination status and employer maintains a record of who self-attest.
Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

This addendum will stay in effect until there are no new COVID-19 cases detected in the exposed group for a 14-day period.

COVID-19 testing

- We provide COVID-19 testing at no cost to all employees, during paid time, in our exposed group except for:
  - Employees who were not present during the relevant 14-day period.
  - Employees who were fully vaccinated before the multiple infections or outbreak and who do not have symptoms.
  - COVID-19 cases who did not develop symptoms after returning to work pursuant to our return-to-work criteria, no testing is required for 90 days after the initial onset of symptoms or, for COVID-19 cases who never developed symptoms, 90 days after the first positive test.
- COVID-19 testing consists of the following:
  - All employees in our exposed group are immediately tested and then again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine, isolation, or exclusion period required by, or orders issued by, the local health department.
  - After the first two COVID-19 tests, we continue to provide COVID-19 testing once a week of employees in the exposed group who remain at the workplace, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
  - We provide additional testing when deemed necessary by Cal/OSHA.

We continue to comply with the applicable elements of our CPP, as well as the following:

1. Employees in the exposed group wear face coverings when indoors, or when outdoors and less than six feet apart (unless one of the face-covering exceptions indicated in our CPP apply).
2. We 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. We evaluate whether to implement physical distancing of at least six feet between persons, or where six feet of physical distancing is not feasible, the need for use of cleanable solid partitions of sufficient size to reduce COVID-19 transmission.

COVID-19 investigation, review and hazard correction

We 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 is documented and includes:

- Investigation of new or unabated COVID-19 hazards including:
  - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
  - Our COVID-19 testing policies.
  - Insufficient outdoor air.
  - Insufficient air filtration.
  - Lack of physical distancing.
• Updating the review:
  o Every thirty days that the outbreak continues.
  o In response to new information or to new or previously unrecognized COVID-19 hazards.
  o When otherwise necessary.
• Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We consider:
  o Moving indoor tasks outdoors or having them performed remotely.
  o Increasing outdoor air supply when work is done indoors.
  o Improving air filtration.
  o Increasing physical distancing as much as feasible.
  o Requiring respiratory protection in compliance with section 5144.

Buildings or structures with mechanical ventilation
We will 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, we will use filters with the highest compatible filtering efficiency. We will 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, if so, implement their use to the degree feasible.
Additional Consideration #2

Major COVID-19 Outbreaks

This addendum will stay in effect until there are fewer than three COVID-19 cases detected in our exposed group for a 14-day period.

We continue to comply with the Multiple COVID-19 Infections and COVID-19 Outbreaks addendum, except that the COVID-19 testing, regardless of vaccination status, is made available to all employees in the exposed group twice a week, or more frequently if recommended by the local health department.

In addition to complying with our CPP and Multiple COVID-19 Infections and COVID-19 Outbreaks addendum, we also:

• Provide employees in the exposed group with respirators for voluntary use in compliance with section 5144(c)(2) and determine the need for a respiratory protection program or changes to an existing respiratory protection program under section 5144 to address COVID-19 hazards.
• Separate by six feet (except where we can demonstrate that six feet of separation is not feasible and there is momentary exposure while persons are in movement) any employees in the exposed group who are not wearing respirators required by us and used in compliance with section 5144. When it is not feasible to maintain a distance of at least six feet, individuals are as far apart as feasible.

• Install cleanable solid partitions that effectively reduce transmission between the employee and other persons at workstations where an employee in the exposed group is assigned to work for an extended period, such as cash registers, desks, and production line stations, and where the physical distancing requirement (described above) is not always maintained.
• Evaluate whether to halt some or all operations at the workplace until COVID-19 hazards have been corrected.
• Implement any other control measures deemed necessary by Cal/OSHA.