

East Bay Regional Park District COVID-19 Prevention Program (CPP)

08/22/2022



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COVID-19 Prevention Program (CPP) for East Bay Regional Park District

This CPP is designed to control exposures to the SARS-CoV-2 (COVID-19) virus that may occur in our workplace and is not intended to limit more protective or stringent state or local health department mandates or guidance that may be issued.

Date: August 22, 2022

I. Authority and Responsibility

Safety is everyone's responsibility, and the Park District requires adherence to safety protocols by all employees. The Risk and Safety Manager, under direction of General Counsel, the General Manager, and the Park District's Board of Directors, has overall authority and responsibility for implementing the provisions of this CPP in our workplace with all managers being responsible for those within their chain of command. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and ensuring employees receive answers to questions about the program in 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. Employees who do not follow mandated safe work practices, including measures to help prevent the spread of COVID-19 in the workplace, may be subject to disciplinary action.

Executive Order N-84-20 was issued in response to the COVID-19 pandemic, which, in certain circumstances, replaces, for the duration of the Executive Order, the exclusion periods and requirements of this Emergency Temporary Standard with the California Department of Public Health's (CDPH) isolation and quarantine periods and requirements. The isolation and quarantine periods and requirements are reflected in **Appendix C: Park District's Exposure Protocols**.

A. Scope

This CPP applies to all Park District employees except for those employees who are working from home or teleworking from a location of their choice, which is not under the control of the Park District. This CPP does not apply to work locations with one employee who does not have contact with other persons or Park District employees.

Park District contractors that are performing construction projects outside within District Property must adopt their own CPP in compliance with the applicable regulations. If working indoors in a Park District facility, they must be in compliance with both the Park District's CPP and their own organization's CPP. More information about entering contractor-controlled construction sites and [overseeing outside contractor construction projects](#) is available on the SharePoint Site.

II. Definitions

For the purposes of the CPP, the following definitions shall apply:

"COVID-19" means coronavirus disease, an infectious disease caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).

“COVID-19 case” means a person who: (1) Has a positive “COVID-19 test” as defined in this section; or (2) Has a positive COVID-19 diagnosis from a licensed health care provider; or (3) Is subject to COVID-19-related order to isolate issued by a local or state health official; or (4) 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.

“Close Contact” means an individual who shared indoor air space for at least 15 cumulative minutes over a 24-hour period within 48 hours of the COVID-19 case first exhibiting symptoms or testing positive regardless of face coverings during the Infectious Period. Under CDPH guidance, the Park District determines Close Contact exposure by employees who:

- (A) were within six (6) feet of proximity to the positive case in open, indoor common areas; OR
- (B) shared non-transitory, smaller discrete space with a positive case within a larger area (e.g., personal office, conference room, breakroom).

“COVID-19 hazard” means potentially infectious material that may contain SARS-CoV-2, the virus that causes COVID-19. Potentially infectious materials include airborne droplets, small particle aerosols, and airborne droplet nuclei, which most commonly result from a person or persons exhaling, talking or vocalizing, coughing, or sneezing, or from procedures performed on persons which may aerosolize saliva or respiratory tract fluids.

“COVID-19 symptoms” means: (1) fever of 100.4 degrees Fahrenheit or higher; (2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches; (6) headache; (7) loss of taste or smell; (8) sore throat; (9) congestion or runny nose; (10) nausea or vomiting; (11) chills; or (12) diarrhea, unless a licensed health care professional determines the person’s symptoms were caused by a known condition other than COVID-19.

“COVID-19 test” means a test for SARS-CoV-2 that is both: (1) Cleared, approved, or authorized 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 (e.g., viral test); and (2) Administered in accordance with the instructions; and (3) Not both self-administered and self-read unless observed by the employer or an authorized telehealth proctor. Examples of tests that satisfy this requirement include tests with specimens that are processed by a laboratory (including home or on-site collected specimens which are processed either individually or as pooled specimens), proctored over-the-counter tests, point of care tests, and tests where specimen collection and processing is either done or observed by an employer. Employees seeking an employer-observed test should contact the Infectious Disease Officer for further instruction or guidance.

“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 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 Infectious Period, and the COVID-19 case was wearing 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 employer. See Labor Code sections 6303¹ and 6304.1.²

“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 (i.e., fabrics that do not let light pass through when held up to a light source) that completely covers the nose and mouth and is secured to the head with ties, ear loops, or elastic bands that go behind the head. A Face Covering is a solid piece of material without slits, visible holes, or punctures, and must fit snugly over the nose, mouth, and chin with no large gaps on the outside of the face. A Face Covering does not include a gaiter, scarf, ski mask, balaclava, bandana, turtleneck, collar, or single layer of fabric.

This definition includes clear Face Coverings or cloth Face Coverings with a clear plastic panel that, despite the non-cloth material allowing light to pass through, otherwise meet this definition and which may be used to facilitate communication with people who are deaf or hard-of-hearing or others who need to see a speaker’s mouth or facial expressions to understand speech or sign language respectively.

“Completed Primary Series” means the employer has documented:

(A) A person’s status two weeks after completing primary vaccination with a COVID-19 vaccine, if applicable, at the minimum recommended interval between the first and second dose in accordance with the approval, authorization, or listing that is:

- (1) Approved or authorized for emergency use by the FDA; or
- (2) Listed for emergency use by the World Health Organization (WHO).

(B) A person’s status two weeks after receiving the second dose of any combination of two doses of a COVID-19 vaccine that is approved or authorized by the FDA, or listed as a two-dose series by the WHO (i.e., a heterologous primary series of such vaccines, receiving doses of different COVID-19 vaccines as part of one primary series). The second dose of the series must not be received earlier than 17 days (21 days with a 4-day grace period) after the first dose.

“Infectious Period” means the following time period unless otherwise defined by CDPH regulation or order when more stringent, in which case the CDPH definitions shall apply: (1) For COVID-19 positive cases who develop COVID-19 symptoms (symptomatic), from two (2) days before they first develop symptoms until all of the following are true: it has been ten (10) days since symptoms first appeared and 24 hours have passed with no fever without the use of fever-reducing medication or ends earlier for a COVID-19 case if they test negative on Day 5 or later; or (2) for COVID-19 positive cases who never develop COVID-19 symptoms (asymptomatic), from two (2) days before until ten (10) days after the

¹ Cal. Labor Code, § 6303, subdivision (a) defines “place of employment” as any place, and the premises appurtenant thereto, where employment is carried on, except a place where the health and safety jurisdiction is vested by law in, and actively exercised by, any state or federal agency other than the division. Subdivision (b) defines “employment” as the carrying on of any trade, enterprise, project, industry, business, occupation, or work, including all excavation, demolition, and construction work, or any process or operation in any way related thereto, in which any person is engaged or permitted to work for hire, except household domestic service.

² Cal. Labor Code, § 6304.1, subdivision (a) defines “employee” as every person who is required or directed by any employer to engage in any employment or to go to work or be at any time in any place of employment.

specimen for their first positive test for COVID-19 was collected or ends earlier for a COVID-19 case if they test negative on Day 5 or later.

Please note that the Infectious Period is relevant for the Park District's exposure investigation and may be different than an employee's required quarantine or isolation period per the CDPH as set forth in Appendix C: Park District's Exposure Protocols.

“Isolation” as defined by the federal Center for Disease Control and Prevention (CDC), means a directive from public health official or licensed health care professional to isolate at home, or in another designated location, because of a positive COVID-19 test or COVID-19 diagnosis. Isolation separates sick people with a quarantinable communicable disease from people who are not sick.

“Major Outbreak” is when 20 or more employee COVID-19 cases in an Exposed Group visited the workplace during their Infectious Period within a 30-day period.

“Outbreak” occurs when three or more employee COVID-19 cases within an Exposed Group visit the workplace during their Infectious Period at any time during a 14-day period.

“Quarantine” as defined by the CDC means a directive from public health official or licensed health care professional to quarantine at home, or in another designated location, because of a Close Contact COVID-19 exposure. Quarantine separates and restricts the movement of people who were exposed to a contagious disease to see if they become sick.

“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.

“Returned Case” means a COVID-19 positive employee who returned to work and did not develop any COVID-19 symptoms after returning. A person shall only be considered a Returned Case for 90 days after the initial onset of COVID-19 symptoms or, if the person never developed COVID-19 symptoms, for 90 days after the first positive test. If a period of other than 90 days is required by a CDPH regulation or order, that period shall apply.

“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 Infectious Period. It does not apply to buildings, floors, or other locations of the employer that a COVID-19 case did not enter, locations where the worker worked by themselves without exposure to other employees, or to a worker's personal residence or alternative work location chosen by the worker when working remotely.

Note: the term “worksite” is used for the purpose of notice requirements only.

“Vaccine Booster Eligible” means it has been at least five (5) months since completing a Pfizer-BioNTech and/or Moderna primary vaccination series or at least two (2) months since completing a Johnson & Johnson single-dose vaccine and the CDC has recommended an additional dose to provide extra protection against COVID-19 variants.

III. Identification and Evaluation of COVID-19 Hazards

The Park District will implement the following actions in our workplace:

Site Supervisors/Facility Managers

- Conduct workplace-specific evaluations, see **Appendix A: Districtwide Plan for Occupying Buildings During COVID-19 Pandemic.**

- Evaluate employees' potential workplace exposures to all persons at, or who may enter, the worksite.
- Evaluate existing COVID-19 prevention controls in the worksite and the need for different or additional controls.

Legal Division-Risk Department / Human Resources Division

- Review applicable orders and general and industry-specific guidance from the State of California, the Center for Disease Control and Prevention, and/or the local health departments related to COVID-19 hazards and prevention. These orders and guidance are both information of general application, including CDPH's Interim guidance for Ventilation, Filtration, and Air Quality in Indoor Environments, and information specific to the employer's industry, location, and operations.
- Evaluate existing COVID-19 prevention controls in the workplace and the need for different or additional controls.
- Coordinate and conduct periodic inspections as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with Park District COVID-19 policies and procedures (see **Appendix B: COVID-19 Site Inspections**).

A. Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by reviewing their worksite and Districtwide protocols and communicating observations and feedback through established communication channels. These communication channels include, but are not limited to: a supervisor or manager, the site supervisor or Facility Manager, the Risk and Safety Manager (510-544-2157), the Health and Safety Coordinator (x2158), or the Department of Human Resources (General Line x2154). Employees are encouraged to use the Employee Safety and Services Portal to submit questions and observations. Issues can also be discussed during periodic worksite inspections with the Health and Safety Coordinator or their designee; common issues identified during these inspections may be discussed at Central Safety Committee meetings for the purpose of sharing lessons learned and best practices. The Park District has a zero tolerance policy towards retaliation against Park District employees who raise or complain about workplace safety concerns.

B. Employee screening

All employees and contractors must follow the Park District's Entry Screening Protocols, which require that those entering facilities attest daily that they have not: (1) tested positive for COVID-19 in the last 10 days unless otherwise directed in writing by Human Resources, the Risk Department, and/or the Infectious Disease Officer that they are cleared to return to work; (2) been in Close Contact with someone testing positive or in isolation for COVID-19 in the last 10 days unless otherwise directed in writing by Human Resources, the Risk Department, and/or the Infectious Disease Officer that they are cleared to return to work; or (3) exhibited one or more symptoms of COVID-19 in the past 24 hours, as defined in Section II. As part of the protocols, all employees and contractors entering Park District facilities must take their own temperature within one-hour prior to entry at each new worksite. Everyone entering any facilities must wear a Face Covering. Face Coverings are not required outdoors. Each worksite is equipped with a touchless thermometer, cleaning supplies, entry questionnaire, extra Face Coverings, and a sign-in sheet.

Employees are required to complete the screening protocols **and** use the sign-in sheets at each facility they enter (primary work location or a visitor elsewhere) regardless of the amount of time intended to be spent in the building (e.g., short visits, drop-offs, or pick-ups). Employees should rely on and adhere to specific return-to-work instructions provided directly from Human Resources, the Risk Department, and/or the Infectious Disease Officer.

IV. Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures may be documented on the **Appendix B: COVID-19 Site Inspections** form and corrected in a timely manner based on the severity of the hazards. Unsafe or unhealthy work conditions may also be reported through your supervisor, manager, and up through your reporting chain or through the Employee Safety and Services Portal. Potential hazards will be addressed as follows:

- The severity of the hazard will be assessed and correction timeframes assigned, accordingly.
- The individuals responsible for timely correction shall be identified.
- Follow-up measures shall be taken to ensure timely correction.

V. Control of COVID-19 Hazards

A. Physical Distancing

Although physical distancing (defined as staying at least six feet from others) is no longer required as part of Cal/OSHA's revised COVID-19 Emergency Temporary Standards, the Park District will continue physical distancing requirements **indoors** to the extent feasible except when performing job duties that may require it (e.g., performing a two-person lift for a heavy object). Physical distancing does not apply in non-congregate common areas, such as bathrooms, walkways, hallways, aisles, and stairwells and does not apply outdoors. Employees may voluntarily choose to continue to physical distance if they prefer.

Additional Restrictions for Recent COVID-19 Cases or Close Contact Exposures:

- 1) An employee who has been cleared to return from isolation/exclusion within the 10 days following a positive test result is **required** to adhere to the following until the full 10 days have passed:
 - Wear a well-fitting Face Covering indoors at all times and **outdoors when within six feet of others**;
 - Physically distance by at least six feet from others; and
 - Must not share vehicles
- 2) An employee with a Close Contact exposure to a COVID-19 case, who has no symptoms, and is not required to exclude from in-person work is **required** to adhere to the following until the testing requirement has been met with a verified negative test result:
 - Wear a well-fitting Face Covering indoors at all times and **outdoors when within six feet of others**);
 - Physically distance by at least six feet from others; and
 - Must not share vehicles.

3) An employee with a Close Contact exposure to a COVID-19 case who has met the testing requirement with a verified negative test result and was either:

(A) cleared to return to work after quarantine (symptoms fully resolved); or

(B) cleared to continue working (never had symptoms),

within the 10-day period following the Close Contact is **strongly recommended** to do the following until the full 10 days have passed:

- Wear a well-fitting Face Covering **outdoors when within six feet of others** (always required indoors per usual CPP protocols);
- Physically distance by at least six feet from others; and
- Not share vehicles.

B. Face Coverings

The Park District shall provide employees with clean, undamaged Face Coverings. Face Coverings must be properly worn by employees over the nose and mouth when indoors and when sharing vehicles with others, regardless of vaccination status and whether or not the vehicle is equipped with a filtration unit. The Park District recommends N95 respirators or KN95 masks when a Face Covering must be worn and requires N95 or KN95 masks when vehicle sharing. The Park District reserves the right to require a higher level of protection. Face shields are not a replacement for Face Coverings, although they may be worn together for additional protection. Face Coverings and other COVID-19 protocols also apply to volunteers of the Park District and contractors who work in-person with Park District employees and on-site at Park District facilities. The Park District shall also communicate Face Covering requirements and applicable building entry protocols to non-employees on premises. Face Coverings must be worn when required by orders from the CDPH and employees will be advised by the Park District when a change occurs.

All work sites shall have a supply of Face Coverings for employee use at no cost the employee and additional coverings can be requested from Central Stores. Park District Facilities or Using a Vehicle Face Coverings, when required, must meet the definition as provided in Section II.

1. Outdoors

Face Coverings are not required when working outdoors, regardless of vaccination status. **Face Coverings are strongly recommended for employees and volunteers who are working outdoors with or around Pre-K to 12 youth or in youth settings.**^{3,4} This requirement is intended to cover youth programs when staff are working with youth over a duration of time and is not intended to cover brief encounters with park users. Employees are always able and encouraged to wear a Face Covering for their safety and the safety of others if they are unsure or concerned about when this exception would apply. Volunteers are strongly recommended to wear Face Coverings in all outdoor settings. Employees and volunteers can voluntarily wear Face Coverings at all times outdoors at work, regardless of vaccination status and without fear of retaliation, reprisal, or harassment.

³ The CDPH provided updated guidance on March 12, 2022 for youth settings, defined as K-12 (Kindergarten – 12th grade) schools, child care, day camps, sports, and other youth activities. The Park District has further broadened the strong recommendation for outdoor face coverings for employees to extend to settings that include preschool-aged children.

⁴ By exception, face coverings are not required to be worn and physical distancing is not required at aquatic facilities by employees while in the water for instruction, training, or responding to potential emergencies.

2. Exceptions

The following are exceptions to the use of Face Coverings while inside Park District facilities or vehicles:

- When an employee is alone in a closed-door room designated for a single occupant or alone in a vehicle;
- When an employee is in a room designated for eating indoors with dining capacity signage posted, at least six feet apart from others, and outside air supplied to the area has been maximized to the extent feasible (e.g., a facility's breakroom if open for dining or a closed-door conference room if designated for dining);
- While actively eating or drinking inside the workplace, not in an enclosed room, provided an employee:
 - (a) is alone in their workspace;
 - (b) is at least six feet apart from others; and
 - (c) places the Face Covering back on when no longer actively eating or drinking. This may result in an employee having to unmask momentarily to take a bite or sip of a drink, put their Face Covering back on and repeating the process in-between active sips or bites; and
 - (d) Outside air supplied to the area has been maximized to the extent feasible.

Employees are encouraged to eat outdoors or alone in their vehicles, instead of indoors.

- Employees wearing respirators required by the Park District and used in compliance with California Code of Regulations (CCR), Title 8, Section 5144 or other safety orders.
- 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. Reasonable accommodations as provided for under the California Fair Employment and Housing Act (FEHA) and the Americans with Disabilities Act of 1990 (ADA) and/or any other applicable state law will be considered on a case-by-case basis through an interactive process with Human Resources staff.
- Specific tasks that cannot feasibly be performed with a Face Covering. This exception is limited to the time period in which such tasks are actually being performed and must be evaluated and authorized by the Division AGM, Risk Department, and/or Human Resources. The Park District shall not prevent any employee from wearing a Face Covering unless it would create a safety hazard, such as interfering with the safe operation of equipment.

Additional Restrictions for Recent COVID-19 Cases or Close Contact Exposures:

- 1) An employee who has been cleared to return from isolation/exclusion within the 10 days following a positive test result is **required** to adhere to the following until the full 10 days have passed:
 - Wear a well-fitting Face Covering indoors at all times and **outdoors when within six feet of others;**
 - Physically distance by at least six feet from others; and
 - Must not share vehicles

- 2) An employee with a Close Contact exposure to a COVID-19 case, who has no symptoms, and is not required to exclude from in-person work is **required** to adhere to the following until the testing requirement has been met with a verified negative test result:
 - Wear a well-fitting Face Covering indoors at all times and **outdoors when within six feet of others**);
 - Physically distance by at least six feet from others; and
 - Must not share vehicles.

- 3) An employee with a Close Contact exposure to a COVID-19 case who has met the testing requirement with a verified negative test result and was either:
 - (A) cleared to return to work after quarantine (symptoms fully resolved); or
 - (B) cleared to continue working (never had symptoms),
 within the 10-day period following the Close Contact is **strongly recommended** to do the following until the full 10 days have passed:
 - Wear a well-fitting Face Covering **outdoors when within six feet of others** (always required indoors per usual CPP protocols);
 - Physically distance by at least six feet from others; and
 - Not share vehicles.

Employees exempted from wearing Face Coverings due to a medical condition, mental health condition, or disability, or due to a hearing impairment or communication with a hearing-impaired person, 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. If their condition or disability does not permit a non-restrictive alternative, the employee shall be at least six feet apart from all other persons and either Fully Vaccinated or tested at least weekly for COVID-19 during paid time and at no cost to the employee. As part of the interactive process, duties, risk of exposure, and other work arrangements may be evaluated and inform the availability of additional reasonable accommodations.

Unless one or more of the exceptions identified above applies, all employees shall wear a Face Covering when indoors.

3. Contractors and Volunteer Requirements

Park District contractors and volunteers working in Park District facilities must follow the same Face Covering requirements and entry screening protocols as employees. Employees who manage contractors or volunteer programs are responsible for providing safety information to those entering Park District Facilities or participating as a volunteer and must provide them a copy of the Park District's COVID-19 Prevention Program. Contractors and volunteers are not required to wear Face Coverings outdoors but are required to wear Face Coverings at all times when indoors. More information about [Overseeing Construction Projects](#) is available on the SharePoint Site.

Members of the public will not be permitted inside any Park District facility without a Face Covering. Should Park District staff experience non-compliance from the public, they may request additional support from Public Safety for enforcement.

C. Engineering controls

The Park District has installed cleanable solid partitions in some worksite facilities to reduce aerosol transmission between people. The Park District shall continue to periodically evaluate existing COVID-19 prevention controls at the workplace and the need for other controls. Employees may submit a help ticket through the [Employee Safety & Services Portal](#) if there is a safety concern and an evaluation of a worksite is needed (e.g., change in work environment or a newly identified hazard).

The Park District will maximize, to the extent feasible, ventilation with outside air for our buildings with mechanical or natural ventilation systems by:

- Having Facility Managers and Site Supervisors evaluate how to maximize ventilation with outdoor air; the highest level of filtration efficiency compatible with the existing ventilation system; and whether the use of portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems, would reduce the risk of COVID-19 transmission. Any questions regarding ventilation systems should be directed to the Chief of Maintenance and Skilled Trades (x2961).
- Facility Managers and Site Supervisors shall minimize the amount of outside air in buildings where the United States Environmental Protection Agency (“EPA”) Air Quality Index is greater than 100 for any pollutant or if opening windows or letting in outdoor air by other means would cause a hazard to Park District employees, for instance from excessive heat or cold. Facility managers and site supervisors are responsible for monitoring air quality for sensitive groups (AQI 101 to 150) and to the extent feasible manually close dampers if an HVAC system exists and is not automated, as well as close access points to external air (e.g., doors, windows). For facilities where no HVAC system exists, doors, windows and other access points to external air must be closed when AQI reaches at least 101. Employees may wear a respirator voluntarily for additional protection.
- Existing mechanical ventilation systems shall be inspected annually and maintained in good working order directly by the Site Supervisor or Facility Manager or their designee and coordinated through MAST.

D. Cleaning and Disinfecting

Cleaning protocols are provided in the [Operational Handbooks](#) and [Districtwide Plan for Occupying Buildings](#). Cleaning and disinfectant products that are considered non-hazardous per OSHA Standard 1910.1200 (Hazard Communication) or require no special protective equipment are made available at the Park District for all employees to use (e.g., Bioesque, Clorox Hydrogen Peroxide Wipes, Sani-Hands). The Park District recommends use of these products that are generally safe. Please contact Central Stores for other green products available. Employees that use any chemical product must read product labeling or the Safety Data Sheet to understand the proper use and handling. Employees are encouraged to contact the Park District’s Health and Safety Coordinator (510-544-2158) or their supervisor for assistance. The Park District’s cleaning and disinfecting policy requires the following:

- Adhering to an at minimum daily cleaning and disinfecting schedule appropriate for your facility for sanitation purposes.

- Informing employees and authorized employee representatives of cleaning and disinfection protocols, including the planned frequency and scope of regular cleaning and disinfection.
- Cleaning and disinfecting must be done in a manner that does not create a hazard to Park District employees or subcontracted employees. Products should always be used following manufacturer's direction and in accordance with the Safety Data Sheet.
- Regular daily cleaning, as described [Districtwide Plan for Occupying Buildings](#), will continue per protocols. Staff must be trained and follow manufacturer's instructions when applying any chemical product.
- Additional cleaning and or disinfecting may be necessary as evaluated and determined on a case-by-case basis through a COVID-19 exposure assessment (See **Appendix C: Park District's Exposure Protocols**).
- Vehicles are strongly recommended to be cleaned before and after each use.

1. Obtaining Safety Data Sheets Through MSDS Online (MSDSO)

All employees have access to Safety Data Sheets (SDS) that provide important information about a chemical product, proper handling, chemical composition, and what to do in case of an exposure. Each site is responsible for uploading new SDSs into the system to keep an accurate and current inventory of chemical products used at their location.

Navigate to MSDSO by one of the following ways and access MSDSO in one of the following ways:

- From a VelocityEHS shortcut icon on select worksite PCs/desktops.
- Online via link on the [Employee Safety & Services Portal - Viewing SDS Online](#)
- From a Park District device. Access is linked to a valid ebarks.org domain email address as part of single sign-on.
- <https://msdsmanagement.msdsonline.com/?ID=EA271389-2130-4B94-AD7BC4F63F7E764D>

If you are unsure of the proper use of a product or handling instructions after reading product labeling or information on the Safety Data Sheet, or questions about how to access MSDS Online, please reach out to your supervisor/manager, the Park District's Health and Safety Coordinator (510-544-2158), or submit a safety ticket through the Employee Safety & Services Portal.

E. Hand sanitizing

In order to implement effective hand sanitizing procedures, the Park District:

- Has evaluated handwashing facilities.
- Determined the need for additional hand sanitation stations.
- Encourages and allows time for employee handwashing.
- Provides employees with an effective hand sanitizer.
- Prohibits hand sanitizers that contain methanol (i.e. methyl alcohol).
- Encourages employees to wash their hands for at least 20 seconds each time.

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

The Park District has evaluated the need for PPE (such as gloves, goggles, and face shields) as required by CCR, Title 8, Sections 3205(c)(7)(D) and 3380, and provided such PPE as needed. The Park District will provide NIOSH-approved respirators (e.g., N95 masks) or the correct size for voluntary use in compliance with CCR, Title 8, Section 5144. Although voluntary, all employees are encouraged to use provided respiratory protection. Face Coverings are required indoors unless a respirator is used.

The Park District shall provide and ensure use of eye protection and respiratory protection, in compliance with Section 5144, when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

The Park District shall make COVID-19 testing available, upon request, at no cost during paid time to the following employees, regardless of vaccination status:

- Symptomatic employees
- All employees who have had a close contact with a COVID-19 case
- All employees in an outbreak or major outbreak (except employees who were not present in the workplace at the relevant time of the outbreak or major outbreak):
 - In the case of an outbreak, all close contacts must be tested or excluded from the workplace until meeting return-to-work requirements.
 - In the case of a major outbreak, all employees must be tested or excluded from the workplace until meeting return-to-work requirements.

VI. Investigating and Responding to COVID-19 Cases

The Park District will investigate and respond to each positive case of COVID-19 in the workplace. The details of the risk assessment process, along with roles and responsibilities of each entity and what information is collected are described in the **Appendix C: Park District's Exposure Protocols**.

Employees who have had a Close Contact COVID-19 exposure while working as determined by the Park District's exposure investigation will be:

- Subject to the exclusion period guidelines (based on whether the employee is symptomatic), COVID-19 testing requirements, and other return-to-work criteria referenced in Attachment I of Appendix C: Park District's Exposure Protocols.
- Able to obtain COVID-19 testing at no cost during their working hours on paid time..
- Provided the information on benefits described in the sections on Training and Instruction, and Exclusion of COVID-19 Cases, below.

VII. System for Communicating

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

- Who employees should report COVID-19 symptoms and possible hazards to, and how. This information has been provided in the Park District's Exposure Protocols and is provided on the [Park District's COVID-19 SharePoint Site](#).
- That employees can report COVID-19 symptoms, possible Close Contacts, and possible workplace safety hazards and/or concerns without fear of reprisal.
- The Park District will notify Park District employees and contracted employees, who were on the premises at the same worksite or facility on the same day as a COVID-19 case during the Infectious Period, of any potential Close Contact. The Park District will notify these employees in writing in a form readily understandable by the employees of such potential exposures within one (1) business day of the time the Park District knew or should have known of a COVID-19 case, in a way that does not reveal any personal identifying information of the COVID-19 case. 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. The Notice shall include the cleaning and disinfection plan required by Labor Code section 6409.6(a)(4). The Notice must be sent to the following:
 - All employees at the worksite during the Infectious Period of the COVID-19 case. If the Park District should reasonably know that an employee has not received the Notice or has limited literacy in the language used in the Notice, then a verbal notice will be provided, as soon as practicable, in a language understandable by the employee.
 - Independent contractors and other employers present at the worksite during the Infectious Period of the COVID-19 case.
- The Park District, within one (1) business day of the time the Park District knew or should have known of a COVID-19 case, shall provide the Notice to the authorized representative, if any, of the COVID-19 case **and** of any employee who had a Close Contact, as required by Labor Code section 6409.6(a)(2) and (c).
- Park District procedures or policies for accommodating employees with medical or other conditions that put them at [increased risk of severe COVID-19 illness](#). Employees who need accommodations should contact their Supervisor/Manager and the Human Resources Benefits Manager (510-544-2162) or the HR General Line (510-544-2154).
- In cases where testing is not required under this policy, employees can voluntarily access COVID-19 testing by contacting their healthcare provider (recommended) or by visiting a free community testing center located throughout Alameda and Contra Costa counties. Some pharmacy locations also provide testing, which is fully covered under the Park District's plans. [The COVID-19 SharePoint Testing Page](#) has links to public health department testing websites, which list free community testing locations. Employees may also contact Kaiser On-the-Job Occupational Health to identify a testing location nearby (1-888-565-9675).
- In the event that the Park District is required to authorize COVID-19 testing on work time because of a workplace Close Contact, Outbreak, or Major Outbreak, the Park District will communicate in writing to the employee the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test. One consequence of a positive COVID-19 test is that the employee will be excluded from

the worksite until they satisfy minimum criteria to return to work. **See Appendix C: Park District’s Exposure Protocols.**

- Information about COVID-19 hazards (including other individuals in contact with our workplace) that employees may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures.

VIII. Training and Instruction

The Park District will provide effective 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 (see Section III).
- Information regarding COVID-19-related benefits to which the employee may be entitled under legally mandated sick and vaccination leave, workers’ compensation law, if applicable, local governmental requirements, existing Park District leave policies, and leave guaranteed by contract or applicable federal and state laws.
- 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;
 - 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
 - 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 but are more effective when used in combination.
- The right of employees to request a respirator for voluntary use without fear of retaliation and at no cost. Whenever respirators are provided for voluntary use: (1) how to properly wear the respirator provided and (2) 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. All Park District employees are required to complete the “Voluntary Respiratory Protection Program” training regardless of vaccination status or current respirator use (available on Summit).
- 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. 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.
- 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 Park District 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.
- The conditions under which Face Coverings must be worn at the workplace (see Section V.B.) and that Face Coverings are required indoors. Employees can request Face Coverings

from the Park District at no cost and wear them at work regardless of vaccination status, without fear of retaliation, reprisal, or harassment.

The Park District has offered, and will continue to offer, trainings to employees to help address questions and provide clarity on emerging public health information and Park District COVID-19 protocols. Training information related to the Park District's COVID-19 response is noticed via email posted either on the Learning Management System, Summit, or COVID-19 SharePoint Site. Specific trainings are mandatory while others may be assigned by supervisors and managers; and others may be elected by employees. Employees should review the recorded training videos provided by the Park District as applicable for their job. Training can be conducted during work hours and should be approved by an employee's supervisor/manager.

Mandatory Trainings

All Employees:

- COVID-19 Vaccination Policy (Summit)
- COVID-19 Prevention Program (Summit)
- Voluntary Respiratory Protection Program (Summit)
- Building Entry Protocols (Summit)
- Districtwide Plan for Occupying Buildings During the COVID-19 Pandemic (in person, in-Summit, and Supervisor-provided)
- Worksite-specific Protocols (Supervisor-provided)

Supervisors/Managers:

- COVID-19 Prevention Program Checklist (Summit)
- Exposure Protocols (on SharePoint)
- Site Visit Checklist for Field Workspaces (Summit)

Operations Division Employees Conducting Field Work:

- Operational Handbook (Supervisor-provided)

Employees Assigned to Peralta Oaks Administrative Headquarters:

- Peralta Oaks Administration Building Worksite-Specific COVID-19 Plan (Summit)

Supervisors and Managers are expected to be familiar with their responsibilities related to workers compensation and the ADA as provided through other District training. In addition to formal training, employees are expected to review safety information as provided through regular messages from the General Manager, Human Resources advisories, and the COVID-19 SharePoint. These communications provide the most current public health information on preventing the spread of COVID-19.

Starting in June 2020, training is logged through the Park District's Learning Management System, Summit. Training rosters and reports can be downloaded from Summit.

IX. Exclusion of COVID-19 Cases and Employees Who Had A Close Contact and Return-to-Work Criteria

Per the Governor's Executive Order, the Cal/OSHA Emergency Temporary Standards regarding exclusion periods have been suspended. The Park District is required to follow California Department of Public Health ("CDPH") guidelines for exclusion and Return-to-Work Criteria, which are set forth in **Appendix C: Park District's Exposure Protocols**.

The Park District shall follow the most restrictive guidelines or requirements issued by Cal/OSHA, the California Department of Public Health, Alameda and/or Contra Costa Public Health Departments to conduct its exposure investigations to identify Close Contacts.

The Park District shall:

- Keep work-related Close Contact employees identified through the Park District's exposure investigation in paid status and assess whether remote work during the isolation or quarantine period is possible. Remote work may consist of completing trainings or assignments for other work groups, Departments, or Divisions and will be temporary in nature during the period of isolation or quarantine. The Park District will provide these employees their normal compensation for the work that they perform for the Park District during the isolation or quarantine period.
- Continue and maintain an employee's earnings, wages, seniority, and all other employee rights and benefits, except whenever it is demonstrated that the COVID-19 exposure is not work-related and/or when an employee received disability payments or was covered by workers' compensation and received temporary disability.
- In cases where the employee tests positive for COVID-19 or has been diagnosed with a COVID-19 illness and the exposure is work-related, workers' compensation benefits may apply.
 - At the time of exclusion, the Park District shall provide employees with information on available benefits including any benefits available under workers' compensation law including Labor Code sections 3212.86 through 3212.88, California Paid Sick Leave Law, any other applicable public benefits, the Park District's own leave policies, and leaves guaranteed by an applicable Memorandum of Understanding (MOU).

If employees are following all safety protocols, identified Close Contacts should be rare.

Employees who are exposed to COVID-19 outside of work may use available California Supplemental Paid Sick Leave until expired or exhausted, regular sick leave, or any other accrued leaves during their quarantine or isolation period. They may also supplement these leaves with other public sources of funds such as State Disability Insurance. If employees exhaust their leave, they may request use of their bargaining unit sick leave banks or elect to incur a negative sick leave balance up to 80 hours, which will be repaid through future accruals.

X. Reporting, Recordkeeping, and Access

It is the Park District's policy to:

- Comply with all reporting and recording obligations as required under the law, including, but not limited to, reporting the COVID-19 positive case to the following individuals and institutions as required based on the individual circumstances:
 - Employees who were present at a Park District worksite or facility when the COVID-19 case was present;
 - The employee organizations that represent employees at the Park District worksite or facility;
 - The employers of subcontracted employees who were present at the Park District

- worksite or facility;
 - The local health department;
 - Cal/OSHA any COVID-19-related serious illnesses or deaths, as defined under CCR, Title 8, Section 330(h), of an employee occurring in our place of employment or in connection with any employment; and
 - The Park District's workers' compensation plan administrator.
- Maintain records of the steps taken to implement the Park District's written COVID-19 Prevention Program in accordance with CCR, Title 8, Section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Investigate COVID-19 Cases, keeping a record and tracking the details of each case (see **Appendix C: Park District's Exposure Protocols**). The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

XI. COVID-19 Prevention When Sharing Vehicles

Employees may share vehicles with other employees following the vehicle sharing protocols as noted below. Employees must consider transportation alternatives before determining whether vehicle sharing is necessary.

Exceptions to vehicle sharing protocols can be made when necessary for emergency response, including firefighting, rescue, evacuation, and support activities directly aiding response.

Additional Restrictions for Recent COVID-19 Cases or Close Contact Exposures:

- 1) An employee who has been cleared to return from isolation/exclusion within the 10 days following a positive test result is **required** to adhere to the following until the full 10 days have passed:
 - Wear a well-fitting Face Covering indoors at all times and **outdoors when within six feet of others**;
 - Physically distance by at least six feet from others; and
 - Must not share vehicles
- 2) An employee with a Close Contact exposure to a COVID-19 case, who has no symptoms, and is not required to exclude from in-person work is **required** to adhere to the following until the testing requirement has been met with a verified negative test result:
 - Wear a well-fitting Face Covering indoors at all times and **outdoors when within six feet of others**;
 - Physically distance by at least six feet from others; and
 - Must not share vehicles.
- 3) An employee with a Close Contact exposure to a COVID-19 case who has met the testing requirement with a verified negative test result and was either:

- (A) cleared to return to work after quarantine (symptoms fully resolved); or
- (B) cleared to continue working (never had symptoms),

within the 10-day period following the Close Contact is **strongly recommended** to do the following until the full 10 days have passed:

- Wear a well-fitting Face Covering **outdoors when within six feet of others** (always required indoors per usual CPP protocols);
- Physically distance by at least six feet from others; and
- Not share vehicles.

A. Assignment of shared vehicles

If sharing of vehicles is necessary and no alternative transportation is reasonable or available, the Park District will prioritize shared vehicle assignments when traveling with more than one employee per the following order. Employees sharing a vehicle must continue to maintain physical distance to the extent feasible (e.g., driver in front and the passenger sitting in the rear, right seat). The prioritization of shared vehicles are as follows:

- Employees residing in the same housing unit.
- Employees working in the same crew or workplace.
- Employees who do not share the same household, work crew or workplace, only when no other transportation alternatives are feasible.

B. Face Coverings and Respirators

The Park District will ensure that the:

- **Vehicle operators and passengers must wear an N95 respirator or KN95 mask Face Covering when sharing vehicles regardless of vaccination status.** N95 respirators and KN95s are available to all employees by the Park District. Employees must plan accordingly to ensure this Face Covering requirement can be met.
- Face Covering requirements of the CPP are followed for employees waiting for transportation if indoors. Face Coverings are not required when outdoors.

Additionally, employees who utilize mules or Utility Task Vehicles (UTVs) that are in open air (i.e., not enclosed), allowing for ample fresh air, are permitted to share the vehicle when used to perform essential functions of their job responsibilities. Thus, Face Coverings, N95s, or KN95s are not required in mules or UTVs, although are encouraged.

C. Screening

Similar to building entry protocols, employees must self-screen for COVID-19 symptoms prior to sharing vehicles and refrain from sharing a vehicle if any of the self-screening question responses is an affirmative response. There are no vehicle sharing sign-in sheets.

D. Cleaning and Disinfecting

The Park District:

- Strongly encourages that all high-contact surfaces (door handles, seatbelt buckles, armrests,

- etc.) used by passengers or drivers are cleaned before and after each trip.
- Will evaluate the need to disinfect all high-contact surfaces used by a COVID-19 case during the Infectious Period.

The Park District also provides sanitizing materials, training on how to use them properly, and ensures they are kept in adequate supply.

E. Ventilation

Windows should be kept open, if possible, 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:

- The vehicle has functional air conditioning in use and excessive outdoor heat would create a hazard to employees.
- The vehicle has functional heating in use and excessive outdoor cold would create a hazard to employees.
- Protection is needed from weather conditions, such as rain or snow.
- The vehicle has a cabin air filter in use and the U.S. EPA Air Quality Index for any pollutant is greater than 100. If the vehicle does not have a cabin air filter and U.S. EPA Air Quality Index for any pollutant is greater than 100, employees will be provided N95 masks for optional use in accordance with the Park District's Wildfire Smoke Protocols.

F. Hand Hygiene

The Park District will provide hand sanitizer in each vehicle and require all drivers and riders sanitize their hands before entering and exiting the vehicle. Hand sanitizers with methanol (methyl alcohol) are prohibited.

G. Helicopter Flights

Due to limited staffing and inability to ventilate the helicopter, additional precautions are in place for multiple occupancy helicopter flights. If an employee wishes to have an administrative helicopter flight, they must demonstrate a negative COVID-19 test within 72 hours prior to the flight time. Employees must wear Face Coverings while inside the helicopter. If you have questions about helicopter procedures, contact Captain Brede or Sergeant Chief Pilot Haga.

XII. Additional Considerations

The Cal/OSHA regulations include specific response criteria that apply when an organization has experienced an Outbreak or multiple Outbreaks or a Major Outbreak. An Outbreak is defined as at least three COVID-19 cases among employees at the same worksite, who live in different households, within a 14-day period. A Major Outbreak is defined as 20 or more employee COVID-19 cases in an Exposed Group who visited the workplace during their Infectious Period within a 30-day period. The Park District will follow the requirements of Cal/OSHA Emergency Temporary Standards regarding Outbreaks and Major Outbreaks (CCR, Title 11, Sections 3205.1 and 3205.2).

Appendix A:

Districtwide Plan for Occupying Buildings During COVID-19

Each worksite must follow the [Districtwide Plan for Occupying Buildings During COVID-19 Pandemic](#), and have a worksite-specific plan. [A blank, fillable worksite-specific plan form](#) can be downloaded from the COVID-19 SharePoint documents library. The completed forms and plans can be found on the [COVID-19 SharePoint Occupancy Plan Site](#).

Appendix B:

COVID-19 Site Inspections

Each worksite will be periodically assessed to ensure that protocols and policies are being followed at the worksite and to help site supervisors and employees identify site-specific solutions on emerging issues. These site visits started in September 2020. Following implementation of this plan, these site inspections will be conducted regularly by trained staff led by the Park District's Infectious Disease Officer and the Health and Safety Coordinator, and with more frequent inspections by Site Supervisors or Managers on a routine basis.

Site Supervisors or Managers should use the same checklist that staff conducting regular COVID-19 site inspections use for consistency and regularly monitor (COVID-19 inspection checklist follows this Appendix B).

Additional site visits may be conducted in response to specific concerns or to ensure that recommended corrections have been implemented. An inspection log with the date of each inspection should be posted at each site. Reoccurring or common concerns may be brought by the Health and Safety Coordinator for notification and discussion at the Park District's Central Safety Committee meetings.



COVID-19 Site Visit Checklist for Workspaces

PARK SITE: _____

DATE: _____

COMPLETED BY: _____

SITE SUPERVISOR: _____

REASON FOR VISIT: STAFF CONCERN SCHEDULED SITE AUDIT DROP IN MGR/SUPERVISOR CHECK

MET WITH: _____

PRIMARY CONCERNS: _____

THE FOLLOWING ITEMS WERE OBSERVED:

- COVID-19 [Worksite Building Entry Protocols](#) were posted correctly.
- Park District Entry Screening Protocols were available for employees to access.
- Setup of building entry/temperature station follows established protocols.
- COVID-19 Worksite [Daily Cleaning Protocols](#) were posted correctly.
- Social Distance Protocol Checklist was posted correctly and is being followed as marked.
- A copy of the Operational Handbook available for employees to access ([COVID-19 Operational Handbook](#))
- All employees observed wearing face coverings when interfacing with public or when indoors, and when 6' distance cannot be maintained.
- All employees were observed maintaining 6' distance at all times, including desk spacing.
- Barriers to assist in separating workers by at least six feet using actions such as physical partitions or visual cues were observed (e.g., floor markings, colored tape, or signs to indicate to where workers should stand; directional hallways so there is a one-way flow of traffic; "call out" on stairwells to enhance social distancing and limit passing one another). Observe any new safety concerns that need to be addressed and note down.
- Ask supervisor: (1) Any new facility COVID-19 safety concerns? Understand AQI must be monitored and building HVAC and/or access points to external air (e.g. doors, windows) must be closed at AQI 101?
- Workplace was stocked with necessary sanitation/cleaning supplies and PPE.
- Vehicles were stocked with necessary cleaning supplies and instructions/reminders for cleaning procedures.
- Altered work practices to limit the number of employees at the office at one time (per CDC, <10 people), such as telework, staggered schedules, and modified work schedule (e.g. staggered start/leave times, 10 hour days, other rotations) were reviewed.
- Site supervisor confirmed employees onsite (clerical and administrative staff) are authorized to work onsite.
- Building/room capacity noted on door, if relevant.
- Inspection log was posted and signed off/updated that site visit was conducted.

OBSERVATIONS: _____

ACTION REQUIRED: _____

ASSIGNED TO: _____

ACTION COMPLETED: _____

COMPLETED BY: _____ **DATE:** _____

NOTES:

Appendix C:

Park District COVID-19 Exposure Protocols

The Park District will investigate all potential COVID-19 cases in the workplace following the Park District's COVID-19 Exposure Protocols. The protocols outline what employees should do if they test positive for COVID-19, experience COVID-19 symptoms, or have a COVID-19 exposure and the Park District's response, including what information will be collected and requirements for maintaining confidentiality.

The Exposure Protocols also includes CDPH guidelines on employee exclusion periods based on vaccination status, testing requirements, and other return-to-work criteria.

(Please click on the link above to access **Appendix C: Park District COVID-19 Exposure Protocols.**)

APPENDIX C: COVID-19 EXPOSURE PROTOCOLS

1. INTRODUCTION

The Park District will continue to focus on preventative measures to keep employees safe while at work. The safety of our workspaces depends on **all** employees following the established Park District protocols and guidelines from the CDC, including:

- Getting vaccinated and staying up-to-date on COVID-19 vaccines/boosters.
- Washing hands often.
- Maintaining at least 6 feet of distance with others.
- Covering mouth and nose with an approved Face Covering, including but not limited to properly fitted N95 respirators or KN95 Face Coverings.
- Monitoring health daily.
- Covering coughs and sneezes.
- Staying home when you are ill; and
- Cleaning and disinfecting frequently touched surfaces.

When employees are following proper physical distancing and sanitation measures at work, the potential exposure to COVID-19 at the worksite is low. The CDC's recommended precautions for low exposure risks are to:

- Be alert for symptoms.
- Practice social distancing.
- Follow CDC guidance, employee physician, and/or the California Department of Public Health (CDPH) for post-exposure quarantine and isolation if symptoms develop.

The instances in which Park District employees are at increased risk in the workplace are limited if protocols are being followed, especially if employees are up-to-date on their COVID-19 vaccinations/booster, consistently wearing a Face Covering when in proximity to other people (required indoors) and avoiding close proximity of six feet or less for anything other than brief passing encounters.

The CDC defines increased risk, where additional precautions are recommended, when exposed or a Close Contact to a person with COVID-19 symptoms or who has tested positive for COVID-19. Individuals who have had "Close Contact" (defined by the CDPH June 8, 2022 health order, Cal/OSHA, and in this Appendix, "Close Contact" means shared indoor airspace¹.

These Exposure Protocols outline what should be done if a Park District employee begins exhibiting symptoms of COVID-19, are exposed to COVID-19, or test positive for COVID-19. A rapid response, consisting of an ill employee remaining home or leaving the worksite immediately, and contacting their healthcare professional, is key for limiting the potential spread of the virus in the workplace. The protocols outline the responsibilities of employees, supervisors, managers, executive managers, Human Resources (sometimes referred to as "HR") Benefits Manager, Infectious Disease Officer, and trained risk assessors in responding to a symptomatic employee.

¹ This definition applies irrespective of whether the person with COVID-19 or the contact was wearing a mask or whether the contact was wearing respiratory personal protective equipment. (Source: [CDC Community Exposures, 1/25/2021](#))

2. GOVERNING REGULATION AND GUIDANCE DOCUMENTS

The Park District's response to a potential COVID-19 close contact exposure is based on the recommendations of Public Health Agencies and following what is permissible under state and federal law. The Park District may ask potentially infected employees about their symptoms and recent work interactions. The Park District is also allowed to notify employees of potential close contact exposures but is required to maintain individual identifying information confidential while protecting health and safety.

Americans with Disabilities Act (ADA): The ADA requires the Park District to maintain the confidentiality of an employee's medical information. Information on ADA and COVID-19 is available through the United States [Equal Employment Opportunity Commission](#).

Centers for Disease Control and Prevention (CDC): The CDC has a large amount of guidance and information. The protocols in this Appendix specifically relies on information contained within their [Public Health Recommendations for Community-Related Exposure](#), and [Interim Guidance for Businesses and Employers](#).

Cal/OSHA Regulation §3205, 3205.1 and 3205.2: Effective November 30, 2020, the new Cal-OSHA Emergency Temporary Standards (ETS) regulations require that employers develop a COVID-19 Prevention Plan, which outlines how the employer will identify and control hazards in the workplace; respond, track and report on workplace close contact exposures; and communicate with and train employees. The regulations incorporate requirements of AB 685 for notification procedures, which are described herein.

California Department of Public Health (CDPH): Per the Governor's Executive Order N-84-20 dated December 14, 2020, CDPH recommendations for employee isolation and quarantine (or "exclusion period") from the workplace replace Cal/OSHA ETS, or if applicable, local health departments with jurisdiction over the workplace, if the periods in the ETS are longer than those recommended by the CDPH or local health department.

California AB 685: Effective January 1, 2021, this legislation primarily defines notification processes for employers who have COVID-19 close contact exposures at the worksite. In the event of an outbreak or major outbreak, the Park District may need to notify public health departments and Cal/OSHA in addition to employees.

The Infectious Disease Officer may additionally consider evolving information being conveyed through local or state public health agencies.

3. RESPONSE PROTOCOLS FOR EMPLOYEES WHO TEST POSITIVE FOR COVID-19

- A. ***Actions for COVID-19 Positive Employee.*** Employees who have tested positive for COVID-19 must be excluded from the workplace for at least 5 days after start of symptoms or after date of first positive test if no symptoms. Contact the Human Resources Benefits Manager, the Infectious Disease Officer, or their designees, to walkthrough a COVID-19 case intake assessment and receive critical information on the return-to-work criteria and guidance. Be prepared to provide responses to questions included in Section 4(A) below, to other questions that will assist the Park District in

determining your Infectious Period, as well as potential risk exposures to the workplace, other employees, and any Close Contacts. These questions are part of the Park District's exposure investigation. If at any point you develop symptoms after your positive test, inform the COVID-19 Response Team immediately as it may change return-to-work requirements.

Employees who test positive for COVID-19 and have symptoms must be symptom-free for at least 24-hours without the use of fever reducing medication to return to work.

Follow the Park District's Exclusion Periods and Return-to-Work Criteria in Attachment 1 which is the same process for all employees who test positive for COVID-19 regardless of vaccination status, the presence of symptoms, or prior infection. Prior infection means that an employee who has tested positive again within the last 90 days following an initial positive test result will still be subject to the exclusion period of at least five (5) days and other requirements as outlined in Attachment 1 for COVID-19 cases.

Additional Restrictions for Recent COVID-19 Cases

An employee who has been cleared to return from isolation/exclusion within the 10 days following a positive test result is **required** to adhere to the following until the full 10 days have passed:

- Wear a well-fitting Face Covering **outdoors when within six feet of others** (always required indoors per usual CPP protocols);
- Physically distance by at least six feet from others; and
- Must not share vehicles

- B. Actions for Park District Staff When An Employee Tests Positive For COVID-19.** The HR Benefits Manager, Risk & Safety Manager, and Infectious Disease Officer, or designees of the COVID-19 Response Team, managers/supervisors of the COVID-19 positive employee, and the positive employee's AGM should follow the steps in 4-(G) below.

4. RESPONSE PROTOCOLS FOR EMPLOYEE WITH A CLOSE CONTACT EXPOSURE TO SOMEONE WITH COVID-19 REGARDLESS OF WHETHER THE EXPOSURE IS WORK-RELATED

- A. Actions for SYMPTOMATIC EMPLOYEE Exposed to Someone with COVID-19,** including those identified as a **Work-Related Close Contact to a COVID-19 Positive Case.** **COVID-19 Symptoms** include fever or 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.²

The Symptomatic Exposed Employee MUST:

- **Go home** if at worksite or stays home if not yet physically present at the worksite.

² Symptoms from CDC website as of 1/26/2021. The CDC notes that this list is not all possible symptoms. [The current list from CDC](#) should be consulted.

- If leaving the worksite during a shift, notify direct supervisor as would be done for leaving prematurely for any illness or other unexpected need.
- **Follow Park District Exclusion Periods Chart and Return-to-Work Criteria in Attachment 1** and quarantine guidelines for an employee with symptoms, regardless of vaccination status, which requires testing. In addition to the testing requirement for all employees who have had a close contact exposure, employees who have symptoms must be symptom-free for at least 24-hours without the use of fever reducing medication to return to work.
- **Call personal healthcare provider**, explain symptoms, and follow their medical guidance, and follow any applicable local or state health orders.
- **Contact Human Resources Benefits Manager** at (510) 544-2162 or the HR General Line (510) 544-2154 as soon as possible after speaking with a healthcare provider.
 - Answer questions as directed by Human Resources Benefits Manager, may include:
 - Date of when symptoms started,
 - Work location,
 - Date of COVID-19 test (specimen collected),
 - Date COVID-19 test results received,
 - Vaccination status,
 - Possible co-workers that were Close Contacts,
 - Whether the employee attended any large gatherings, visited crowded public places, potential external exposures in social settings,
 - Doctor's direction (e.g., recommendation for testing or waiting for further symptoms/response).

Stay home and follow medical guidance, as provided by the personal healthcare provider and/or Human Resources Division, which may include getting tested for COVID-19, quarantining, and/or self-isolating.

- Follow-up with Human Resources Benefits Manager with any new information that may be helpful in assessing risk to other employees, such as any test results received or changes to/onset of symptoms. Employee's doctor may send the notification directly to the HR Benefits Manager on behalf of the employee.
- Complete Worker's Compensation claim form, if eligible³;
- Complete and code timecard as described in the How To Complete Timecards with Implementation of Families First Coronavirus Relief Act (FFCRA) document on SharePoint in the [Timecard Coding folder](#) or as otherwise directed by Department of Human Resources;

³ To be eligible for workers compensation an employee must test positive for COVID-19 and worksite transmission *may* need to be demonstrated.

- Employees who have a workplace close contact COVID-19 exposure may be tested on work time and will be required to quarantine.
- Employees may work remotely if required to quarantine.
- Return to work after satisfying the Exclusion Period requirements and Return-to-Work criteria outlined in Attachment 1-2 and confirming with the COVID-19 Response Team any changes to their situation that would impact their ability to return to work safely.

Additional Restrictions for Recent Close Contact Exposures

- A symptomatic employee with a Close Contact exposure to a COVID-19 case who has met the testing requirement with a verified negative test result **and** was cleared to return to work after quarantine but still within the 10-day period following the Close Contact is ***strongly recommended*** to do the following until the full 10 days have passed:
 - Wear a well-fitting Face Covering **outdoors within six feet of others** (always required indoors per usual CPP protocols);
 - Physically distance by at least six feet from others; and
 - Not share vehicles.

B. Actions for ASYMPTOMATIC EMPLOYEE With a Close Contact Exposure to Someone with COVID-19, including those identified as a Work-Related Close Contact to a COVID-19 Positive Case.

- Asymptomatic employees regardless of vaccination status are not required to exclude from the workplace but must test within three to five (3-5) days following a Close Contact, subject to other requirements. Employees are strongly encouraged to get vaccinated and boosted. **See the Park District's Exclusion Periods Chart in Attachment 1 for more details.**

Additional Restrictions for Recent Close Contact Exposures

- An employee with a Close Contact exposure to a COVID-19 case, who has no symptoms, and is not required to exclude from in-person work is ***required*** to adhere to the following until the testing requirement has been met with a verified negative test result:
 - Wear a well-fitting Face Covering **outdoors when within six feet of others** (always required indoors per usual CPP protocols);
 - Physically distance by at least six feet from others; and
 - Must not share vehicles.
- An employee with a Close Contact exposure to a COVID-19 case who has met the testing requirement with a verified negative test result and was cleared to continue working within the 10-day period following the Close Contact is ***strongly recommended*** to do the following until the full 10 days have passed:
 - Wear a well-fitting Face Covering **outdoors within six feet of others** (always required indoors per usual CPP protocols);
 - Physically distance by at least six feet from others; and
 - Not share vehicles.

C. Action of the Supervisor:

- If contacted directly by the ill employee, directs them to: 1) go home or stay home if required and as set forth in Attachment 1-2 and 2) contact their healthcare provider, and 3) contact the Infectious Disease Officer, Risk Manager, and HR Benefits Manager as soon as possible.
- Assists, as requested, in conducting exposure risk assessment and relays relevant information. This may include providing details on the work schedule and assignments of employees, as well as, providing information about the worksite's social distancing practices and cleaning history.
- If the ill employee follows-up with the supervisor and reports any new information, direct them to contact Human Resources and relays any new information to Human Resources.
- In response to a risk assessment and as directed by the Infectious Disease Officer, coordinate with Manager to implement cleaning, close worksite⁴, or reassign staff; and
- When an employee is confirmed positive for COVID-19, the Site Supervisor/Facility Manager must complete and post "COVID-19 Known Exposure Signage" on an exterior door where it is visible to those entering the worksite. The sign must be completed with the dates of 1) notification; 2) risk assessment; and 3) site cleaning. The Park District's COVID-19 Response Team can provide guidance on the posting.

D. Actions for COVID-19 Response Team (currently the Infectious Disease Officer, Risk Manager, and the HR Benefits Manager or their designees responsible for conducting risk assessments):

- Collects information from employee exhibiting COVID-19 symptoms following a standard questionnaire/form.
- Provides employee letter with information on leave options, timecard coding, and asks the employee to follow-up once illness subsides or they have test results.
- Immediately following notification from employee of suspected COVID-19 illness, sends a subset of information to other COVID-19 Response Team members including:
 - Date of possible exposure,
 - Location of possible exposure,
 - List of employees that were potentially exposed.
- Receive any COVID-19 test results.

⁴ When staff follow safety protocols routinely, in most situations, closing the worksite will not be required.

- If employee who has entered a Park District worksite while potentially infectious tests positive for COVID-19, the COVID-19 Response Team member must do the following:⁵
 - Directs any employee identified during the risk assessment as having a close contact exposure to the infected employee to leave the worksite if symptomatic in order to quarantine and contact their healthcare provider for any additional guidance.
 - Provide leave and benefit information to affected employees.
 - Direct COVID-19 case to contact the Risk and Safety Manager for workers' compensation information if applicable³.
 - Notify via email:
 - Employee's supervisor/manager.
 - The worksite of all employees including visiting employees and contractors (also known as the exposed group) identified as having potential contact with the positive employee.
 - Employees identified as Close Contact exposures to the positive employee.
 - Employee's representative bargaining group, if applicable; and
 - General Manager, Assistant General Manager (AGM) of HR, AGM of the positive employee, Chief of HR, to give notice of the COVID-19 positive case.
- Track the status of each employee on leave for quarantine or isolation.
- Receive "all clear" notification from employee/doctor when return to work criteria are satisfied and help the employee transition back to work in accordance with Attachments 1-2.

E. *Actions for Infectious Disease Officer and Risk & Safety Manager*

- Train COVID-19 Response Team members on the intake, exposure investigation, and safety risk assessment processes including changes to Park District protocols or related local and State requirements.
- Conduct, or coordinate and assigns risk assessment work to trained COVID-19 Response Team members as needed for coverage.
- Provide Manager/Unit Manager with a list of janitorial cleaning or deep cleaning services and process for assessing risk.
- Keep records of all risk assessments and provides weekly summary to the Emergency Operations Center (if activated) and Executive Team.
- Contacts the local public health department for any reporting obligations.
 - In the case of serious illness, death, or outbreak, notifies Cal/OSHA as required by law.

⁵ If an employee is working remotely and has not entered Park District facilities or interacted with other employees tests positive for COVID-19, the Park District does not need to notify the worksite; however, the positive employee will still be provided leave information and included in summary reports of the Park District's COVID-19 cases.

- In consultation with Manager, Chief, and AGM assess potential risk exposure and determines next steps.

Low Risk Incident – *no prolonged contact (less than 15 cumulative minutes over single or multiple encounters per 24-hour period) in open/closed space, 6 feet distancing maintained, face coverings worn, safety protocols followed.*

- Site cleaning of surfaces, shared tools and equipment.
- Reminders to all staff of key safety protocols and self-monitoring.

Elevated Risk Incident – *confirmed close contact (more than 15 or more cumulative minutes over single or multiple encounters per 24-hour period) in closed space, 6-feet distancing not maintained, face coverings not worn indoors or when face coverings are required if within the 10-day Infectious Period following Close Contact exposure or a positive test result, workplace safety protocols not followed.*

- Site cleaning of surfaces, shared tools and equipment. An external cleaning service may be contracted for confirmed COVID-19 positive cases.
- Employees who have had a prolonged, Close Contact exposure (15 or more cumulative minutes within 24-hours during the Infectious Period) to a coworker confirmed with COVID-19 will be provided with the applicable exclusion guidance if any and return-to-work requirements. Employees who have had Close Contact with an unconfirmed symptomatic employee will be directed to contact their healthcare provider for direction.
- Employees without prolonged, Close Contact may be sent home or relocated to an alternative worksite if the worksite requires deep cleaning.

F. Action of Manager/Unit Manager:

- If contacted directly by the ill employee, direct them to go home or stay home depending on the employee's status, contact their healthcare provider, and contact the COVID-19 Response Team.
 - Contact the COVID-19 Response Team Contacts on the flowchart to relay any information relevant for a risk assessment. The flowchart itself is not a substitution for reporting the exposure or positive case to the COVID-19 Response Team.
- In coordination with Supervisor (if applicable), implements response:
 - Close areas of worksite, as necessary, for cleaning.
 - Identify alternative work site/assignment as needed for employees temporarily displaced from worksite, but not sent home.
 - Schedule disinfecting, janitorial cleaning, or deep cleaning depending on circumstance and risk level
 - In most low-risk cases, disinfecting surfaces and tools is sufficient if determined to be required.
 - In elevated-risk cases, with a confirmed positive case of COVID-19, janitorial or deep cleaning may be scheduled, as directed by the Infectious Disease Officer (IDO).

- Notify any employees with Close Contact to consult with their healthcare provider. Employees should contact the HR Benefits Manager for information on leave.
 - If cleaning is necessary and once cleaning is complete, reopens worksite areas and sends email to the worksite informing of cleaning procedures.
- Contracted cleaning services are the responsibility of the department unless directed by the IDO.

G. Action of Division Assistant General Manager (AGM):

- Consult with Unit Manager and Infectious Disease Officer and provide support as needed for the risk assessment and response process.
- Communicates high level general facts of positive cases to other AGMs as part of Executive Team meetings. These details may include:
 - Date of notification
 - Date of risk assessment,
 - Date of site cleaning,
 - Number of positive test results
 - Worksite location where positive test was confirmed.
- Establish a process for notifying staff within chain-of-command about positive cases, both inside and outside of the Division, as an opportunity to learn from the case and revisit and emphasize preventative measures. Employees should be notified through established communication channels, preferably through interactive, regularly scheduled meetings that allow for questions and discussion.

5. RESPONSE PROTOCOLS FOR PUBLIC SAFETY EMPLOYEES UNDER CAL/OSHA §5199

If a first responder is ill, the employee will follow the same protocols as those described above. Captain/Chief/Manager will follow the decision protocols above for cleaning needs. First responders working under Cal/OSHA 5199 (Aerosol Transmissible Diseases), who have a Close Contact exposure to someone suspected or confirmed to have COVID-19 while at work must report the incident up through their chain of command and notify Human Resources, the Infectious Disease Officer, or the Risk and Safety Manager for an intake assessment. The Park District strongly recommends the employee consult with their health care provider. First responders may be subjected to reduced quarantine periods subject to public health guidance.

6. RESPONSE PROTOCOLS FOR EMPLOYEES WHO HAVE COVID-19 CONCERNS BUT ARE ASYMPTOMATIC AND DO NOT HAVE CONFIRMED EXPOSURE TO COVID-19

An employee who has COVID-19 concerns but does not meet the definition of a Close Contact exposure and is not exhibiting COVID-19 symptoms is encouraged to contact their healthcare provider for direction. A healthcare provider will make an assessment as to whether the employee should be tested for COVID-

19, quarantine, or isolate based on the perceived exposure risk. If the healthcare provider recommends or requires the employee to test, quarantine, or isolate, the employee should contact the Infectious Disease Officer and the Human Resources Benefits Manager for leave information. If the employee begins to exhibit symptoms of COVID-19 or tests positive for COVID-19, Section 1 and 2 protocols above will be followed.

The Park District maintains the discretion to require a higher level of protection and may require employees with COVID-19 symptoms to stay home and refrain from in-person work unless expressly authorized in writing by the Risk Department and Human Resources to return. Otherwise, employees who have symptoms must be symptom-free for at least 24-hours without the use of fever reducing medication to return to work.

7. EMPLOYEE EXCLUSIONARY PERIODS FROM THE WORKSITE

Per the Governor's Executive Order, the Cal/OSHA Emergency Temporary Standards regarding workplace exclusion periods have been suspended indefinitely. The Park District is now required to follow California Department of Public Health (CDPH) guidelines which are set forth in the following Attachment 1: Park District Exclusion Periods and Return-to-Work Criteria and Attachment 2 flowchart of the same process.

ATTACHMENT 1

PARK DISTRICT EXCLUSION PERIODS AND RETURN-TO-WORK CRITERIA

COVID-19 Status	Isolation or Quarantine	Period of Time to be Excluded from the Workplace and Other Employee (EE) Return-to-Work Criteria
<p>COVID-19 POSITIVE All employees that test positive for COVID-19 regardless of vaccination status, prior infection, or symptoms</p> <p style="text-align: center;">1</p>	Isolation for At Least 5 Days	<ul style="list-style-type: none"> Must be excluded from the workplace for at least five (5) days from the date symptoms began or date of first positive test (if no symptoms). May return to work after Day 5, if a diagnostic specimen test (antigen preferred) is taken Day 5 or Later and test is negative and no symptoms. Must wear face covering, physically distance, no vehicle sharing if cleared to return within the 10-day period. If still positive on Day 5 or Later test, must exclude the remainder of the 10-day Infectious Period. If EE cannot test, can return after Day 10 if no symptoms and fever-free for at least 24 hours without the use of fever-reducing medication. If symptoms develop <i>after</i> your positive test result, inform the District as it may change your return-to-work guidance. EEs are strongly encouraged to get vaccinated and boosted.
<p>CLOSE CONTACT EXPOSURE Symptomatic employees regardless of vaccination status, exposed to someone with COVID-19</p> <p style="text-align: center;">2</p>	Quarantine; Must Exclude from In-Person Work	<ul style="list-style-type: none"> Must be excluded and test as soon as possible and continue to exclude until test results are obtained. * <ul style="list-style-type: none"> * If using an <i>antigen</i> test the first 1-2 days from when symptoms began and results are negative, EE must retest again 3-4 days from when symptoms began and have a 2nd negative test to be cleared. Negative test results: may return to work once symptom-free and no fever w/o the use of medication for at least 24 hours. Strongly recommended to wear a face covering outdoors if within 6 feet of others, practice physical distancing, and no vehicle sharing for the remaining 10 days. If EE has positive test results, follow Category #1 above. If an EE cannot test, exclusion continues through the entire 10-day period. The EE may return after Day 10 once they are symptom-free for at least 24 hours and no fever without the use of fever-reducing medication.
<p>CLOSE CONTACT EXPOSURE Asymptomatic employees regardless of vaccination status, exposed to someone with COVID-19</p> <p style="text-align: center;">3</p>	No Quarantine Unless Symptoms Develop	<ul style="list-style-type: none"> No exclusion required but must test within 3-5 days. EE may continue working and must wear a face covering at all times (including outdoors within 6 feet), practice physical distancing, and must not vehicle share following the Close Contact until verified negative test. <p>Note: Returned Cases (<i>EEs who had COVID-19 within the last 90 days</i>) do not need to test unless symptoms develop.</p> <ul style="list-style-type: none"> If symptoms develop prior to test results, follow Category #2 above. Positive test results: follow Category #1 above. Negative test results: EE may remain at work; strongly recommended to continue no vehicle sharing, practice physical distancing, face covering outdoors if EE may be within 6 feet of others. If an EE cannot test as advised, must exclude entire 10 days from Close Contact exposure and can return after Day 10.

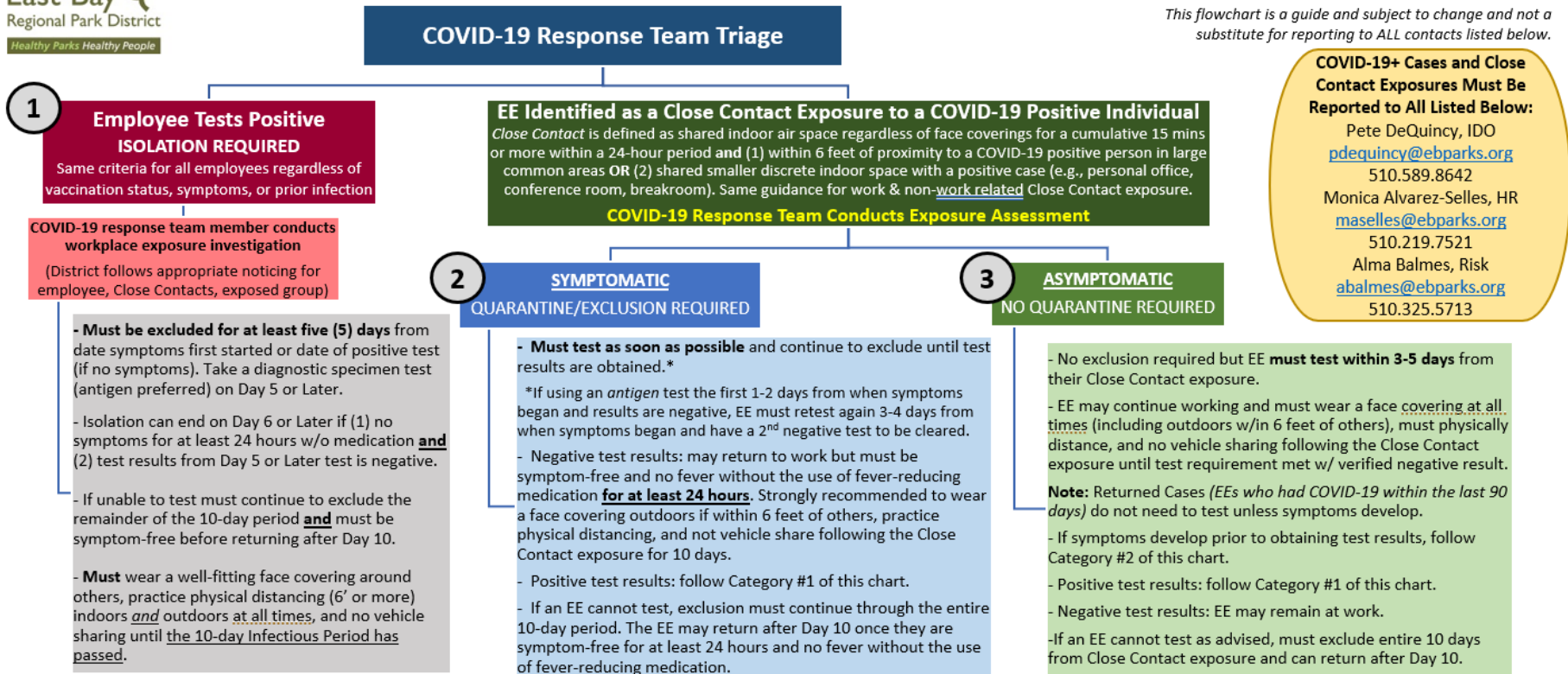
NOTE: The Park District strongly recommends N95 respirators or KN95 masks for the greatest level of protection, particularly during the Infectious Period.



COVID-19 Exclusion Periods and Return-to-Work Criteria

Version 08.22.22

This flowchart is a guide and subject to change and not a substitute for reporting to ALL contacts listed below.



COVID-19+ Cases and Close Contact Exposures Must Be Reported to All Listed Below:

Pete DeQuincy, IDO
pdequincy@ebparks.org
510.589.8642

Monica Alvarez-Selles, HR
masselles@ebparks.org
510.219.7521

Alma Balmes, Risk
abalmes@ebparks.org
510.325.5713

COVID-19 Testing Information and Return-to-Work (RTW) Requirement

Per the CPP, testing is required for RTW procedures for COVID-19 cases, Close Contacts (CC), and major outbreaks. Rapid antigen tests are accepted if observed by a telehealth provider, third-party testing site, or the Park District. The District will observe at-home antigen tests to meet the requirement (cannot be self-read). Contact Pete or Alma to coordinate with the COVID-19 Response Team. Antigen tests from the Park District are available to all employees especially those: experiencing symptoms, who had a work-related close contact exposure, or in an outbreak.

Sick with COVID-19 like symptoms but no known exposure; other illness? Current District protocol is employee must stay home; do not report in-person. Must be symptom-free for 24 hours w/o use of medication. EE must coordinate options with supervisor (telework if appropriate or take sick time). The District can provide an antigen test kit for an employee experiencing COVID-19 symptoms.

Based on Guidelines from the California Department of Public Health and Cal/OSHA