COVID-19 Prevention Program (CPP) for Associated Students, California State University, Northridge, Inc. (AS)

Date: 05/01/2023

This CPP is designed to control exposures to the SARS-CoV-2 virus (COVID-19) that may occur in our workplace.

Authority and Responsibility

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

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

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Conduct workplace-specific evaluations and periodic inspections, in coordination with California State University, Northridge (CSUN) Environmental Health and Safety and Facilities, as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with COVID-19 policies and procedures. Appendix A: COVID-19 Office Evaluation Checklist may be utilized for this purpose.
- Evaluate employees’ potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.

Employee participation

Employees, while working on campus, are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

- Reporting to management without fear of negative consequences any COVID-19 hazards they observe
- Accepting an invitation to join a member of management or the AS COVID-19 Coordinator while evaluating workspaces for any necessary protocol changes required; or
- Providing suggested solutions to modifications of worksites, workflow or processes to encourage compliance with COVID-19 policies and procedures.

Employee screening

Employees are encouraged to self-screen for symptoms of COVID-19. If the employee exhibits COVID-19 symptoms, they are advised not to come to work and to consult with their medical provider. Employees are to call their manager or supervisor and advise that they will not be reporting to campus for their shift and to inquire about leave options.
**Correction of COVID-19 Hazards**

Unsafe or unhealthy work conditions, practices or procedures will be documented on the Appendix A: COVID-19 Office Evaluation Checklist form, and corrected in a timely manner based on the severity of the hazards. The severity of the hazard will be assessed and correction time frames assigned by the AS COVID-19 Coordinator, in consultation with the CSUN COVID-19 Coordinator program, CSUN Environmental Health & Safety, and/or other campus entity(s). During this process, those individuals and/or campus entity(s) responsible for timely correction will be identified, and notified. To ensure timely correction, the AS COVID-19 Coordinator will determine and follow a plan to follow-up with the individuals and/or campus entity(s) responsible for correction, as well as assess the hazard correction.

**Control of COVID-19 Hazards**

**Face Coverings**

Face coverings are not required in our workspaces, except as outlined below.

Employees with an elevated risk of contracting COVID-19 are strongly recommended to wear masks while indoors. Individuals at elevated risk include those who are 65 years of age or older, unvaccinated, those with underlying medical conditions and/or are immunocompromised.

All employees and members of our community retain the individual discretion to continue wearing a mask in our workplace and on campus. Employees can continue to request assistance in securing masks through their area’s COVID-19 coordinator.

Additionally, for employees who test positive and are subsequently cleared to return to campus after their isolation period, or for employees who report an exposure, masking may be required as directed by the CSUN COVID-19 contact tracers.

Acceptable face coverings include Medical-grade/surgical mask, KN95 mask, KN94 mask or N95 mask.

**Engineering controls**

HVAC systems have been evaluated and tested to allow for proper air flow/exchange in the mitigation of the spread of COVID-19. For worksites covered by the sublease agreement with the University Student Union (USU), the USU is responsible for such evaluation, as well as proper maintenance and adjustment. For worksites elsewhere on campus, evaluation, maintenance, and adjustment is to be coordinated with CSUN PPM and Facilities. Wherever possible or indicated, filtration efficacy will be increased to the highest level compatible with the existing system.

**Cleaning and disinfecting**

Employees reporting for work in worksites that are open and operational are advised of the frequency and scope of cleaning and disinfection in their areas.

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

- Providing needed sanitization supplies for hands, surfaces, work areas, restrooms.
- Providing time for employees to implement sanitizing protocols during their shift.
- It is recommended that shared equipment and surfaces (such as computers and printers) should be sanitized before and after each use using provided sanitizing solution and paper towels or sanitizing wipes.
  - Note: Employees must not spray cleaner directly on computer keyboards or printer interface panels. Sanitizer should be sprayed on a paper towel first, then wipe.
- Regular cleaning by custodial personnel of workspaces that are utilized by employees.
- Increased frequency of cleaning and disinfecting of high-touch surfaces by custodial personnel.

Should replenishment of supplies be required, employees are to notify their manager or supervisor, who will in turn request additional supplies from the AS administrator designated as the organization’s COVID-19 Coordinator. Additional supplies may also be ordered from CSUN PPM.
Shared tools, equipment and personal protective equipment (PPE)

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools should also not be shared, to the extent feasible. Where there must be sharing, the items should be disinfected between uses by the employees using the equipment. Shared equipment (such as computers and printers) should be sanitized before and after each use using provided sanitizing solution and paper towels or sanitizing wipes. Note: Employees must not spray cleaner directly on computer keyboards or printer interface panels. Sanitizer should be sprayed on a paper towel first, then wipe. Employees should be trained and/or instructed on appropriate cleaning protocol and frequency by their manager or supervisor.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Encourage and allow time for employee handwashing.
- Encourage employees to wash hands frequently with soap and water for at least 20 seconds each time.
- Provide employees with an effective hand sanitizer (with minimum 60% alcohol content), and encourage it’s use when hand washing is not possible.
- Provide handwashing facilities either in open and operational worksites, or by coordinating access to nearby restroom(s) during working hours.

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

We evaluate the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, and provide such PPE as needed.

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained.

PPE must not be shared, e.g., masks, gloves, goggles and face shields.

Investigating and Responding to COVID-19 Cases

When an employee reports a positive COVID-19 diagnosis to a manager or supervisor within AS, the manager or supervisor will advise the AS Human Resources Manager of the diagnosis.

For employees who have performed any work in any AS location within the 14 days preceding the positive test result, the AS Human Resources Manager will:

- Report the positive test to Sedgwick, AS’s workers compensation insurance administrator, within three business days of learning of the positive case.
- Report the highest number of employees who reported to work at the employee’s specific worksite location in the 45 days preceding the last day the employee worked at the specific worksite location to Sedgwick.
- Conduct an internal investigation to mitigate potential exposure of other employees. This will be accomplished by using the Appendix B: Investigating COVID-19 Cases form.

Employees who had potential COVID-19 exposure in our workplace will be offered COVID-19 testing at no cost during their working hours. Those employees will be notified by the AS Human Resources Manager with instructions on how to obtain the testing.

AS will continue and maintain an employee’s earnings, seniority, and all other employee rights and benefits whenever we’ve demonstrated that the COVID-19 exposure is work related. This will be accomplished through our worker’s compensation insurance provider and providing any required employer-paid sick leave benefits where not covered by worker’s compensation. Information will also be provided regarding COVID-19-related benefits to
which the employee may be entitled under applicable federal, state, or local laws.

AS employees who are diagnosed with COVID-19 or who have an exposure to COVID-19 are required to self-report the diagnosis or exposure through the established reporting system that the CSUN campus maintains. Employees in this instance will be provided with the web url to report their diagnosis or exposure.

System for Communicating

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

- Instructions that employees should report COVID-19 symptoms and possible hazards to John Doebler, AS Human Resources Manager via email (john.doebler@csun.edu) or telephone (818-677-4206) or Daniela Cross, AS Risk & Facilities Manager via email (daniela.cross@csun.edu) or telephone (818-677-2490).
- That employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Where testing is not required, how employees can access COVID-19 testing. Employees can obtain voluntary testing through their personal physician’s office or at a county run testing facility. A list of testing facilities in Los Angeles County can be found at the website: https://covid19.lacounty.gov/testing/.
- In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test. AS partners with Concentra Occupational Health Centers for this type of testing and testing that is in response to CCR Title 8 section 3205.1, Multiple COVID-19 Infections and COVID-19 Outbreaks, as well as section 3205.2, Major COVID-19 Outbreaks.
- Information about COVID-19 hazards employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures.

Training and Instruction

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
  - COVID-19 is an infectious disease that can be spread through the air.
  - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
  - An infectious person may have no symptoms.
  - Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
  - The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
  - 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 - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
• COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
• Appendix C: COVID-19 Training Roster will be used to document this training.

Exclusion of COVID-19 Cases
Where we have a COVID-19 case in our workplace, we will limit transmission by:

• Ensuring that COVID-19 positive cases are excluded from the workplace until our return-to-work requirements are met.
• Informing employees with COVID-19 exposure of any required masking, distancing, and/or follow-up reporting requirements in the workplace for 10 days after the last known COVID-19 exposure to a COVID-19 case.
• Continuing and maintaining an employee’s earnings, seniority, and all other employee rights and benefits whenever we’ve demonstrated that the COVID-19 exposure is work related. This will be accomplished through our worker’s compensation insurance provider and providing any required employer-paid sick leave benefits where not covered by worker’s compensation.
• Providing employees at the time of exclusion with information on available benefits.

Reporting, Recordkeeping, and Access
It is our policy to:

• Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
• Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.
• Maintain records of the steps taken to implement our 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.
• Use the Appendix B: Investigating COVID-19 Cases form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

Return-to-Work Criteria
Employees who test positive for COVID-19, with or without symptoms, will Isolate for 10 days from the date of the positive COVID-19 test or the date when symptoms started (whichever occurred first). If the following criteria is met, isolation may end after day 5 and before 10 days:

• At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
• COVID-19 symptoms are not present, are mild or are resolving.

If at day 10 symptoms are not resolving or a COVID-19 test is positive, employees will continue isolation until the following criteria is met:

• At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
• COVID-19 symptoms are not present, are mild or are resolving.
If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.

References

https://www.csun.edu/covid-19
https://www.dir.ca.gov/dosh/coronavirus/

Approved by:

__________________________  _______________
AS Executive Director       Date
Appendix A: COVID-19 Office Evaluation Checklist

COVID OFFICE EVALUATION CHECKLIST

Department:  
Building:  
Room/Suite:  
Contact Information:  
FPDC/PPM Dept. Evaluator:  
EH&S Dept. Evaluator:  
Date of Evaluation:  

Work Area Evaluation – Purpose: evaluate social distancing within the office environment with the FPDC/PPM/EH&S Evaluators and Department Office COVID Coordinator. All materials needed will be put on the PPM COVID Office order form:

Lobby/Reception

☐ Identify quantity of floor stickers needed to indicate a six (6) foot distancing for line queues. Add to order form.

☐ Evaluate the counter and identify size of barrier(s) plexiglass needed to separate employees from visitors and co-workers. Add to order form.

☐ Waiting Area—suggest to remove chairs that should not be used to maintain six (6) foot distancing.

☐ Identify any informational materials or equipment that may be shared use (e.g. kiosks, computers, pens, forms, etc.)

☐ Identify quantity of wipes and/or cleaner next to shared equipment. Add to order form.

☐ Identify signage for sanitation/wipe-down protocol (before and after each use). Add to order form.

Private Office(s) and Cubicles

☐ Identify barriers (plexiglass) needed for office/cubicles where appropriate. Add to order form.

☐ Department Office COVID Coordinators will determine new locations for these persons if no space available develop staggered work schedules.

☐ Identify barriers (plexiglass) needed if six (6) feet distancing will work. Add to order form.

☐ Identify any special areas.

Open Work Stations

☐ Identify personnel seating in workstations/cubicles less than six (6) foot apart from each other.

☐ Department Office COVID Coordinators will determine new locations for these persons if no space available develop staggered work schedules.

☐ Identify barriers (plexiglass) needed if six (6) feet distancing will work. Add to order form.

☐ Identify any special areas.
Workrooms

☐ Evaluate work room area for six (6) foot physical distancing.

☐ Determine number of employees who can occupy the space during their routine tasks.
   *Occupancy determined as: ____________ Add to order form.*

☐ Identify signage on door indicating number of occupants. Add to order form.

☐ Identify quantity of wipes and/or cleaner next to shared equipment. Add to order form.

☐ Identify signage for sanitation/wipe-down protocol (before and after each use). Add to order form.

☐ Identify any special areas.

Conference Rooms

☐ Evaluate conference room for six (6) foot physical distancing.

☐ Determine number of staff who can occupy the space having meetings/routine tasks.

☐ Identify signage needed on door indicating safe number of occupants and entrance/exit procedures
   *Occupancy determined as: ____________ Add to order form.*

☐ Identify signage for sanitation/wipe-down protocol (before and after each use). Add to order form.

☐ Identify chairs that should not be used.

Break Rooms/Kitchenettes

☐ The sharing of appliances typically found in breakrooms should temporarily be suspended such as refrigerators, microwaves, coffee makers, washable cups and utensils.

☐ Department COVID Coordinator will be responsible for informing staff of alternatives and options for food storage and eating locations and posting closure notices, signage for sanitation/wipe down protocol (before/after each use), and unplugging appliances.

Please contact the Department of Environmental Health and Safety regarding additional safety protocols to allow minimal use of appliances.

☐ This assessment has been completed and approved by the Department COVID Coordinator.

Additional Evaluation (AS):

☐ Hazard(s) identified:

☐ Date Hazard(s) corrected:
Appendix B: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 testing or related medical services provided by us will be provided in a manner that ensures the confidentiality of employees, with the exception of unredacted information on COVID-19 cases that will be provided immediately upon request to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law.

All employees’ medical records will also be kept confidential and not disclosed or reported without the employee’s express written consent to any person within or outside the workplace, with the following exceptions: (1) Unredacted medical records provided to the local health department, CDPH, Cal/OSHA, NIOSH, or as otherwise required by law immediately upon request; and (2) Records that do not contain individually identifiable medical information or from which individually identifiable medical information has been removed.

Date: [enter date]

Name of person conducting the investigation: [enter name(s)]

<table>
<thead>
<tr>
<th>Employee (or non-employee*) name:</th>
<th>Occupation (if non-employee, why they were in the workplace):</th>
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<tbody>
<tr>
<td>Location where employee worked (or non-employee was present in the workplace):</td>
<td>Date investigation was initiated:</td>
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<tr>
<td>Was COVID-19 test offered?</td>
<td>Name(s) of staff involved in the investigation:</td>
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<td>Date and time the COVID-19 case was last present in the workplace:</td>
<td>Date of the positive or negative test and/or diagnosis:</td>
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<td>Date the case first had one or more COVID-19 symptoms:</td>
<td>Information received regarding COVID-19 test results and onset of symptoms (attach documentation):</td>
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Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):
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<th>Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:</th>
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<tr>
<td><strong>All employees who may have had COVID-19 exposure and their authorized representatives.</strong></td>
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<tr>
<td><strong>Independent contractors and other employers present at the workplace during the high-risk exposure period.</strong></td>
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<td><strong>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</strong></td>
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<td><strong>Was local health department notified?</strong></td>
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<tr>
<td>Names of employees that were notified:</td>
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<td>Names of individuals that were notified:</td>
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**What could be done to reduce exposure to COVID-19?**

*Should an employer be made aware of a non-employee infection source COVID-19 status.*
Appendix C: COVID-19 Training Roster

Date: [enter date]
Department: [enter department]
Subject of training: [enter subject of training]
Name and title of person(s) that conducted the training: [enter name(s) and title(s)]

<table>
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<tr>
<th>Employee Name</th>
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