



COVID – 19 IIPP

October 2020

Prepared for:

County of Santa Clara

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1 Foreword

The County of Santa Clara (County) is concerned for the health and safety of all county employees, contractors, vendors, and visitors from exposure to airborne infectious diseases such as the 2019 novel coronavirus disease (COVID-19).

The COVID-19 Injury and Illness Prevention Program (COVID-19 IIPP) requires county departments to review current Aerosol Transmissible Disease (ATD) Plans to provide employees with information for preventing exposure to the coronavirus (SARS-CoV-2), the virus that causes COVID-19. When covered departments effectively implement the ATD Plans, they may also reduce exposure risks for employees in the workplace who may not have patient contact.

There are additional departments with employees that are not covered by the ATD plans. The department Injury and Illness Prevention Program still requires employees to be protected from workplace hazards, such as an infectious disease like COVID-19. Departments are required to determine if a COVID-19 infection is a hazard in their workplace. If it is a workplace hazard, then employers must implement infection prevention and control measures.

This plan requires all county departments to implement infection prevention and control measures to coronavirus (SARS-CoV-2), the virus that causes COVID-19.

2 Introduction

The COVID-19 IIPP applies to all departments covered by the Aerosol Transmission Disease Plan and to departments that are not covered by the ATD plan.

Departments covered by the ATD plans include:

- Hospitals, skilled nursing facilities, clinics, medical offices, outpatient medical facilities, home health care, long-term health care facilities, hospices, medical outreach services, medical transport, and emergency medical services.
- Certain laboratories, public health services and police services that are reasonably anticipated to expose employees to an aerosol transmissible disease.
- Prisons, jails, homeless shelters, and drug treatment programs.
- Coroner's offices and other facilities that perform aerosol generating procedures on cadavers.

Department Aerosol Transmission Disease Plans should be updated and include job specific information related to COVID-19 IIPP.

All other departments will update and implement the Injury and Illness Prevention Program with the COVID-19 IIPP as necessary that:

- Is specific to your workplace,
- Identifies all areas and job tasks with potential exposures to COVID-19, and
- Includes prevention and control measures to eliminate or reduce such exposures.

2.1 Establish Prevention and Control Measures

As the country responds to the novel COVID-19 Pandemic, our knowledge and understanding of how to manage it is ever changing as new information becomes available from our nation's public health protection agency the Center for Disease Control and Prevention (CDC) and from the Occupational Safety and Health Administration (OSHA) and other agencies, in coordination with California and Santa Clara County public health authorities. Infection prevention and control measures are therefore improving over time and the most current information and policies should be referenced as they become available.

The following [Cal/OSHA Interim General Guidelines on Protecting Workers from COVID-19](#) guidelines are the most authoritative and generally accepted infection prevention and control measures currently available. They should be included in the written IIPP when applicable to the workplace.

- Actively encourage sick employees to stay home.
- Once notified by the employee, immediately send employees home or to medical care, as needed, if they have a frequent cough, fever, difficulty breathing, chills, muscle pain, headache, sore throat, or recent loss of taste or smell.
- Ensure employees who are out ill with fever or acute respiratory symptoms do not return to work until both of the following occur:
 - At least three full days pass with no fever (without the use of fever-reducing medications) and no acute respiratory illness symptoms; and
 - At least 10 days pass since the symptoms first appeared.
- Provide employees with paid sick leave or expanded family and medical leave for specified reasons related to COVID-19 in accordance with Santa Clara County policy.
- Ensure employees that return to work following an illness promptly report any recurrence of symptoms.
- Encourage employees to telework from home when possible.
- Practice physical distancing by cancelling in-person meetings, using video or telephonic meetings, and maintaining a distance of at least 6 feet between persons at the workplace when possible.

- Provide employees with cloth face covers or encourage employees to use their own face covers for use whenever employees may be in workplaces with other persons. Cloth face coverings are not personal protective equipment (PPE), but combined with physical distancing of at least six feet, they may help prevent infected persons without symptoms from unknowingly spreading COVID-19.
- Avoid shared workspaces (desks, offices, and cubicles) and work items (phones, computers, other work tools, and equipment) when possible.
 - If they must be shared, clean and disinfect shared workspaces and work items before and after use.
- Establish procedures to routinely clean and disinfect commonly touched objects and surfaces such as elevator buttons, handrails, copy machines, faucets, and doorknobs. Surfaces should be cleaned with soap and water prior to disinfection. These procedures should include:
 - Using disinfectants that are approved by the Environmental Protection Agency ([EPA approved](#)) for use against the virus that causes COVID-19.
 - Providing EPA-registered disposable wipes for employees to wipe down commonly used surfaces before use.
 - Following the manufacturer's instructions for all cleaning and disinfection products (e.g., safety requirements, PPE, concentration, contact time).
 - Ensuring there are adequate supplies to support cleaning and disinfection practices.
- If an employee is confirmed to have COVID-19 infection:
 - Inform employees of their possible exposure to COVID-19 in the workplace but maintain confidentiality as required by the Americans with Disabilities Act (ADA).
 - Temporarily close the general area where the infected employee worked until cleaning is completed.
 - Conduct deep cleaning of the entire general area where the infected employee worked and may have been, including breakrooms, restrooms, and travel areas, with a cleaning agent approved for use by the EPA against coronavirus. It should ideally be performed by a professional cleaning service.
 - Any person cleaning the area should be equipped with the proper PPE for COVID-19 disinfection (disposable gown, gloves, eye protection, mask, or respirator if required) in addition to PPE required for cleaning products.
- Advise employees to avoid non-essential travel if possible and check [CDC's Traveler's Health Notices](#) prior to travel.

For employees in departments with frequent contact with the public, arrange work and implement measures that account for the possibility that the public is a possible contamination source, including:

- Conduct even more frequent cleaning and disinfection of surfaces touched by the public such as credit card machines, touch screens, countertops, and doors.
- Protect employees and others who have frequent interaction with the public at a service counter with engineering controls such as Plexiglas screens or other physical barriers, or spatial barriers of at least six feet, if feasible.
- If exposures to the public cannot be eliminated with engineering controls, require, or encourage customers to wear face coverings, which are mandatory in some jurisdictions.
- Schedule work to allow frequent hand washing by employees handling items (cash, credit cards, documents) touched by members of the public. Notably, employees working in food facilities must be permitted to wash their hands every 30 minutes and additionally, as needed.
- Enforce physical distancing by limiting the number of customers in public spaces.
- Ask customers to take precautions such as only touching items they intend to take with them and provide hand sanitizer stations.
- Provide workers handling items touched by the public with PPE (i.e., disposable gloves).

2.2 Provide Employee Training

Provide training in a language that is readily understandable by all employees on the following topics:

- General description of COVID-19, symptoms, when to seek medical attention, how to prevent its spread, how to notify the department’s supervisor of an illness and the department’s procedures for preventing its spread at the workplace.
- How an infected person can spread COVID-19 to others even if they are not sick.
- How to prevent the spread of COVID-19 by using cloth face covers, including:
 - [CDC guidelines](#) that everyone should use cloth face covers when around other persons.
 - How cloth face covers can help protect persons around the user when combined with physical distancing and frequent hand washing.
 - Information that cloth face covers are not protective equipment and do not protect the person wearing a cloth face cover from COVID-19.
 - Instructions on washing and sanitizing hands before and after using face coverings, which should be washed after each shift.
- Cough and sneeze etiquette.

- Washing hands with soap and water for at least 20 seconds, after interacting with other persons and after contacting shared surfaces or objects. As noted above, employees working in food facilities must be permitted to wash their hands every 30 minutes and additionally, as needed.
- Avoiding touching eyes, nose, and mouth with unwashed hands.
- Avoiding sharing personal items with co-workers (i.e., dishes, cups, utensils, towels).
- Providing tissues, no-touch disposal trash cans and hand sanitizer for use by employees.
- Safely using cleaners and disinfectants, which includes:
 - The hazards of the cleaners and disinfectants used at the worksite.
 - Wearing PPE (such as gloves).
 - Ensuring cleaners and disinfectants are used in a manner that does not endanger employees.

2.3 Washing Facilities

Regardless of COVID-19 risk, all employees must be provided washing facilities that have an adequate supply of suitable cleansing agents, water, and single-use towels or blowers.

2.4 Personal Protective Equipment (PPE)

Departments will conduct a hazard assessment to determine if any PPE is needed to protect employees from hazards that are present or are likely to be present in the workplace, including the health hazards from the COVID-19. The department must select and provide employees with properly fitting and sanitary PPE that will effectively protect them against these hazards. Departments must also ensure that the appropriate PPE is provided to and used by employees who use cleaners and disinfectants.

[Current CDC guidelines](#) do not recommend that the general public wear respirators or masks to protect against COVID-19 that are intended for health care employees. Consistent with CDC guidelines, and considering current respirator and surgical mask shortages and their prioritization for health care employees, it is not recommended that respirators or masks be required for most employees at this time.

[Cal/OSHA has also provided guidance for health care facilities for employees covered by the Aerosol Transmission Disease Standard.](#)

The [California Department of Public Health \(CDPH\) has provided guidance](#) for the use of cloth face coverings by the general public when outside the home. It mandates that face coverings be worn state-wide by the general public under certain circumstances.

3 Roles and Responsibilities

3.1 COVID-19 IIPP Manager (OSEC)

The Countywide administration of the COVID-19 IIPP will be the responsibility of the Occupational Safety and Environmental Compliance Division (OSEC).

Responsibilities:

- Oversees the Countywide COVID-19 IIPP
- Maintains central records for the administration of the program (i.e. training, annual reviews, OSHA Log 300)
- Acts as liaison with all affected Departments

3.2 Agency / Department Head

The Agency / Department Head ensures that County Departments take the necessary steps when an employee has symptoms consistent with COVID-19 at work and when County Departments receive notice that an employee who has been working onsite has tested positive for COVID-19. Department Heads may consult Fran Palacio in the County Executive's Office if they have questions how to respond to an employee with COVID-19 symptoms.

3.3 Agency / Department Safety Coordinator

The Agency / Department Coordinator acts as liaison between his/her department and OSEC. The department head will appoint this position.

Responsibilities:

- Coordinates or delegates training for the agency or department.
- Confirms that personnel attend training classes.
- Confirms that adequate supply of PPE is maintained.
- Conducts an incident investigation if an employee reports having symptoms consistent with COVID-19 at work.
- Notifies the Agency / Department Head, OSEC and Cal/OSHA within 8 hours of an employee receiving a Serious Injury or Illness at work.

3.4 Employees

Employees affected by this plan should be conscientious and follow necessary safe work practices.

Responsibilities:

- Attend all necessary training.
- Wear the prescribed personal protective equipment.
- Follow safe work practices.
- Notify the supervisor if the employee has symptoms consistent with COVID-19 at work.

4 Program Reviews

Annual program reviews shall be performed by the Agency/Department of the COVID-19 IIPP, or its designee. OSEC will maintain the program review records.

The following items need to be addressed by the designated person performing the program review:

- Ensure that written control procedures are in practice and accessible to affected employees
- Ensure that affected employees receive the necessary initial training and annual refresher training
- Ensure that affected employees have access to an adequate supply of personal protective equipment and hand washing facilities.

5 Applicable Regulations and Guidance.

The primary source of information for the County of Santa Clara COVID-19 IIPP is the [Cal/OSHA Interim General Guidelines on Protecting Workers from COVID-19, May 14, 2020](#). It is the most current, relevant, and generally accepted source of information to effectively prevent and control COVID-19 in the workplace. This guidance document should be taken together with other reliable sources published by Federal OSHA, the National Institute of Occupational Safety and Health (NIOSH), the Center for Disease Control and Prevention (CDC), California Department of Public Health (CDPH), and all other applicable Cal/OSHA regulations.

The list of the most current and frequently cited sources of information relative to the prevention and control of COVID-19 in the workplace is referenced below. These interim guidelines are subject to change and should be periodically monitored for updates as the management practices of the

pandemic evolves. These sites will lead to more comprehensive sources of information that may be tailored to fit a specific need.

[Cal/OSHA Interim General Guidelines on Protecting Workers from COVID-19, Cal/OSHA May 14, 2020.](#)

[Interim Guidance for Businesses and Employers Responding to Coronavirus Disease 2019 \(COVID-19\), CDC May 2020.](#)

[GUIDANCE FOR THE USE OF FACE COVERINGS, CDPH June 18, 2020.](#)

[Cal/OSHA Interim Guidance on COVID-19 for Health Care Facilities: Severe Respirator Supply Shortages, Cal/OSHA August 6, 2020.](#)

[COVID-19, Federal OSHA October 7, 2020.](#)

[COVID-19 Information for the Workplace, NIOSH 2020.](#)

[How to Protect Yourself & Others, CDC September 11, 2020.](#)

[List N: Disinfectants for Coronavirus \(COVID-19\), EPA 2020.](#)

[CDC's Traveler's Health Notices, CDC 2020.](#)

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