COVID-19 Prevention Program (CPP) for
Notre Dame de Namur University

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

Date of last review: August 19, 2022
Authority and Responsibility

The NDNU Department of Human Resources 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.

Employees can reach Human Resources via email: hr@ndnu.edu or phone: 650-508-3645.

Identification and Evaluation of COVID-19 Hazards

We implement the following in our workplace:

- Conduct workplace-specific evaluations using the Identification of COVID-19 Hazards form.
- Document the vaccination status of our employees by using ADP Workforce Now application survey which is maintained as a confidential record.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Develop COVID-19 policies and procedures to respond effectively and immediately to individuals at the workplace who are a COVID-19 case to prevent or reduce the risk of transmission in the workplace.See below for those policies and procedures.
- 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.
- Conduct periodic inspections as needed to identify and evaluate unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures. Inspections are logged and the records are maintained in the NDNU Facilities office.

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by contacting Human Resources (hr@ndnu.edu) and Facilities (jroth@ndnu.edu) detailing any COVID-19 hazards they have identified.

Employee screening

Any employee who is feeling ill should stay home, whether COVID-19 related or not.

Employees will self-screen for COVID-19 symptoms before coming to work:

Have you experienced any of the following symptoms in the past 48 hours: 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, diarrhea?

Individuals with any COVID-19 symptoms or close contact with someone with COVID-19 should not come to work, and they should contact their health care provider to see if COVID-19 testing is warranted. The return to work and exclusion from work criteria are listed below.

Individuals with symptoms or possible exposure to COVID-19 should contact NDNU Human Resources Office (hr@ndnu.edu) so that the institution can notify close contacts.

Return to Work and Exclusion policies are listed below.

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures are documented on the COVID-19 Inspections Form and corrected in a timely manner based on the severity of the hazards. The Facilities Department at NDNU is responsible for investigating and correcting COVID-19 Hazards. To report Hazards, faculty and staff should email Jessie Roth (jroth@ndnu.edu), with copy to Human Resources (hr@ndnu.edu). If hazards are reported to Management, those concerns will be forwarded directly to Facilities and Human Resources for follow-up.

NDNU Facilities staff will assess the severity of the hazard and identify the corrections that are needed. The timeframe for correction will be communicated to Human Resources and NDNU Senior Management, with intermediate/temporary changes taken as needed until the lasting correction can be implemented.

Control of COVID-19 Hazards

Face Coverings

Upon request, NDNU will provide clean, undamaged face coverings in the Public Safety Office (St Mary's Hall). Written and visual instructions on how to properly wear a face covering are available at this location. Face coverings should be worn by employees that are not fully vaccinated when they are indoors, in vehicles, and where required by orders from the California Department of Public Health (CDPH) or as required by local public health orders. As local health orders regarding face coverings change, employees will be notified via university email and signage on building entrances. Employees can replace their face covering at any time by going to the Public Safety Office in St. Mary's Hall and requesting a new face covering.

Signs setting out NDNU policy for wearing a face covering and illustrating the proper way to wear a face covering (covering the nose and mouth) are posted on entrances to all University buildings and offices. This serves to inform non-employees of the requirements for everyone entering the university's workplaces. Email communication and website information will detail where to obtain a face covering if the individual does not have one.

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

- When an employee is alone in a room or a vehicle.
- While eating or drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent feasible.
- Employees are required to wear respirators in accordance with our respirator program that meetssection 5144 requirements.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability,or who are hearing-impaired or communicating with a hearing-impaired person. Such employees willwear an effective, non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition permits it.
- Specific tasks that cannot feasibly be performed with a face covering. This exception is limited to thetime in which such tasks are being performed.

Any employee not wearing a required face covering or allowed non-restrictive alternative, will be at least six feet apart from all other persons unless the unmasked employee is either fully vaccinated or tested at least weekly for COVID-19.

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

Engineering controls

For indoor locations, we identify and evaluate how to maximize, to the extent feasible,ventilation with outdoor air using the highest filtration efficiency compatible with our existing ventilation system, and whether the use of portable or mounted High Efficiency Particulate Air (HEPA) filtration units,or other air cleaning systems, would reduce the risk of transmission. We have implemented the following:
- Each classroom has a portable Restor Air purifier to eliminate odor, smoke and eliminate SARS-CoV-2 by 99% (per manufacturer's specifications).
- For additional air flow, many office and classroom doors or windows may be opened to maximize the amount of outside air. Note that when the EPA Air Quality Index is over 100, or during extreme heat or cold, windows and doors should not be open to outside air.
- Air Purifiers are checked daily to ensure they are working properly by the Facilities Department staff. Filters will be replaced according to the manufacturer's specifications.

Cleaning and disinfecting

NDNU Facilities Department has responsibility for cleaning and disinfecting campus spaces. We implement the following cleaning and disinfection measures for frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, phones, headsets, bathroom surfaces, and steering wheels:

- Custodial staff clean common spaces and frequently touched surfaces daily based on CDC guidelines for sanitizing and disinfection protocols.
- Employees and authorized employee representatives have been notified of the frequency and scope of cleaning and disinfection through email communication as well as upon request.
- For classrooms and offices, sanitizing wipes are provided to clean personal space used.

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

- Areas, materials, and equipment used by a COVID-19 case during high-risk exposure period will be properly disinfected.

Hand sanitizing

To implement effective hand sanitizing procedures:
- Hand sanitizing stations are available throughout high use buildings. Hand sanitizer that contains methanol is prohibited.
- All bathrooms are stocked with soap. Regular handwashing is encouraged throughout the day.
- Employees are asked to sanitize their hands before and after using shared resources such as copy machines.
- Sanitizer and soap availability will be checked regularly.
- Signs encouraging employees to wash hands for at least 20 seconds are posted in restrooms.
- Employees may report empty dispensers to Facilities (jroth@ndnu.edu) or Human Resources (hr@ndnu.edu).

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

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

Upon request, we provide respirators for voluntary use to all employees who are not fully vaccinated and who are working indoors or in vehicles with more than one person. Respirators will also be available if there is a major outbreak to the employees I the exposed group. Respirators may be requested from Facilities (Jessie Roth at jroth@ndnu.edu). Employees will be shown how to properly wear a respirator, including how to get a good seal.

We provide and ensure use of respirators in compliance with section 5144 when deemed necessary byCal/OSHA.

Testing of symptomatic employees

We make COVID-19 testing available at no cost to all employees who had close contact in the workplace and have COVID-19 symptoms, during employees' paid time. Per San Mateo County Health Department: employees should first contact their health provider for testing. Additionally, there are no-cost options for testing individuals who live and work in San Mateo County: https://www.smcgov.org/testing . Appointments are strongly recommended.

Investigating and Responding to COVID-19 Cases

We have developed effective procedures to investigate COVID-19 cases that include seeking information from our employees regarding COVID-19 cases, close contacts, test results, and onset of symptoms. NDNU will track this information through the Human Resources Department.

We also ensure the following is implemented:

Procedures for investigating COVID-19 cases and details on return to work policies will be shared with all employees via email and on university website. Campus and office/building

notification of possible exposure will include information for testing and return to work guidelines.

Employees that have had close contact with a COVID-19 case in the workplace may get testing during their working hours through their own healthcare provider or through a San Mateo County testing site: https://www.smcgov.org/testing. NDNU Human Resources department will notify all individuals who have come into close contact with an on-campus COVID-19 case within one business day of a COVID-19 case that was in the workplace during the "high risk exposure period." This will occur via NDNU email as well as communication with the managers in each affected area. Any guests or independent contractors will also be notified through their on-campus host/convener. The information provided will include a list of symptoms for self-check, information on where to get tested for COVID-19, and information on return to work / exclusion from work (as outlined below).

System for Communicating

Our goal is to ensure that we have effective two-way communication with our employees, in a form theycan readily understand, and that it includes the following information:
• Employees should report COVID-19 symptoms, possible close contacts, and hazards via email to Human Resources (hr@ndnu.edu). If managers receive this information, they should immediately pass it along to Human Resources.
• Employees can report symptoms, possible close contacts, and hazards without fear of reprisal.
• Employees with medical or other conditions that put them at increased risk of severe COVID-19 illness can request accommodations by emailing Human Resources (hr@ndnu.edu).
• Access to COVID-19 testing when testing is required: primary access to testing is through an individual's health care provider or a County Health Testing site.
• The 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. COVID-19 cases will be treated confidentially, but notice must go out to coworkers who share the same building or area. Every effort will be made to keep the identity of the COVID-19 case confidential.
• Communication will occur primarily through university email, with additional resources posted on the NDNU COVID-19 webpage and communicated through supervisors.

Training and Instruction

We provide effective employee training and instruction that includes:

• Our COVID-19 policies and procedures to protect employees from COVID-19 hazards, and how to participate in the identification and evaluation of COVID-19 hazards.
• Information regarding COVID-19-related benefits (including mandated sick and vaccination leave) towhich 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 touchestheir eyes, nose, or mouth.
  ○ An infectious person may have no symptoms.
• The fact that particles containing the virus can travel more than six feet, especially indoors, so physicaldistancing, face coverings, increased ventilation indoors, and respiratory protection decrease the spread of COVID-19 and are most effective when used in combination.

- The right of employees that are not fully vaccinated to request a respirator for voluntary use, without fear of retaliation, and our policies for providing the respirators. Employees voluntarily using respiratorswill be trained according to section 5144(c)(2) requirements:
  - How to properly wear them.
  - How to perform a seal check according to the manufacturer's instructions each time a respirator isworn, and the fact that facial hair can interfere with a seal.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using handsanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment.Since COVID-19 is an airborne disease, N95s and more protective respirators protect the users from airborne disease, while face coverings primarily protect people around the user.
  - The conditions where face coverings must be worn at the workplace.
  - That face coverings are additionally recommended outdoors for people who are not fully vaccinatedif six feet of distance cannot be maintained.
  - Employees can request face coverings and can wear them at work regardless of vaccination statusand without fear of retaliation.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if theemployee has COVID-19 symptoms.
- Information on our COVID-19 policies and how to access COVID-19 testing and vaccination, and thefact that vaccination is effective at preventing COVID-19, protecting against both transmission and serious illness or death.

Human Resources will keep a roster of those who complete training. Every effort will be made to have all employees complete the training.

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

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- For employees excluded from work, continuing, and maintaining employees' earnings, wages, seniority,and all other employees' rights and benefits. This will be accomplished by employees using sick leave benefits or California Supplemental Sick Time benefits. California Supplemental Sick Time may be used by employees who are: 1) subject to quarantine or isolation related to COVID-19 or experiencing COVID-19 symptoms and seeking a medical diagnosis; 2) caring for a family member who is subject to COVID-19 related quarantine/isolation or is caring for a child whose school or place of care is closed due to COVID-19; and 3) attending a vaccine appointment or cannot work/telework due to vaccine-related symptoms.
- 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 and outbreaks at our workplace to the local health department whenever required by law, and provide any related information requested by the localhealth department.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program

inaccordance with section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorizedemployee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use ADP Workforce Now Contract Trace system to keep a record of and track all COVID-19 cases.

Return-to-Work Criteria

If you test positive (regardless of your vaccination status).. People who have *tested positive* will follow CDC *isolation* guidelines, regardless of vaccination status, and may return to work after the home isolation period is over:

- Stay home for 5 days.
- If no symptoms develop or symptoms are resolving after 5 days, the employee can return to work.
- Continue to wear a mask around others for 5 additional days.
- If you have a fever, continue to stay home until your fever resolves.

If you were in close contact with an infected person (regardless of your vaccination status). The CDC defines close contact as being within 6 feet of a person who tested positive for a total of at least 15 minutes in a 24-hour period. If you have had a close contact do the following:
- If there are no symptoms, there is no need to stay home, and the employee can report to work.
- Wear a mask around others for 10 days.
- Test on day 6, if possible.
- If symptoms develop, the employee must test and stay home.

If an order to isolate, quarantine, or exclude an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted.

Approved by:

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Gregory White, Provost and Senior Vice President

Date: _____