CREDO HIGH SCHOOL COVID PREVENTION PROGRAM (CPP)
Board Adopted: February 8, 2021

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

AUTHORITY AND RESPONSIBILITY
The Executive Director and COVID Coordinator have overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all 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
Conduct workplace specific evaluation using the Sonoma County Schools Reopening Checklist. We will implement the following in our workplace:

- 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 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 unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.

EMPLOYEE PARTICIPATION
Credo established a Reopening Plan for the 2020-2021 school year that was created with the intent to provide our students with an equitable, accessible and engaging educational experience to prevent further learning loss and make meaningful connections in the uncertainty that is ahead of us. Employees and their authorized employees’ representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

- Reporting the employee’s presentation of COVID-19 symptoms and the employee’s possible COVID-19 close contact exposures
- Reporting any identified COVID-19 hazards to their immediate supervisor
- Following all Face Covering, Physical Distancing, Sanitization and Cleaning protocols (as described below) Self-Quarantining when required following travel, potential exposure
EMPLOYEE SCREENING

All employees reporting to work will be screened for COVID-19 symptoms and risk factors. Body temperatures are taken as a precautionary measure to reduce the spread of COVID-19. This practice is due to our current county risk level of “widespread”. This practice will continue until further notice.

Upon arrival to work and prior to entering any other areas of the campus or worksite, employees are required to report to the Temperature Screener Station. At the Station, every employee will:

- Self-assess their symptoms and risk factors via the online COVID-19 Self Evaluation Form
- Have their temperature taken by a District employee with a contactless thermometer
- Wash their hands, use hand sanitizer, or clean with an alcohol wipe prior to and after touching any equipment (i.e. thermometer, pen, etc.).

Symptom check protocols will be provided for both students and staff prior to and/or when arriving on campus. Student temperature checks will be taken at school with a no-touch thermometer (students with a fever of 100.0 or higher should stay home or may be sent home pending symptoms).

CORRECTION OF COVID-19 HAZARDS

In the interest of protecting community and workplace health, any student, parent, staff and community member shall report in writing any known or observed unsafe condition in the working environment, or work issue related to COVID-19 to the site COVID Coordinator. The Coordinator shall respond as soon as possible, but not to exceed three (3) working days, respond in writing to the individual who submitted a written complaint. The severity of the hazard will be assessed and correction time frames assigned. The COVID Coordinator will be responsible for ensuring timely correction typically by the maintenance staff. The Director will ensure all follow-up measures are taken to ensure timely correction.

Credo takes all concerns and complaints seriously. The School values the concerns of our staff, students, parents and community members. Complaints are respected and honored; there are no negative consequences for filing a complaint. No reprisals or retaliation shall be invoked against any staff, student, parent or community member for filing a complaint in good faith, a complaint, either on an informal or formal basis, or for participating in any way in the complaint procedures.

CONTROL OF COVID-19 HAZARDS

Where possible, we ensure at least six feet of physical at all times in our workplace (and no less than four feet). Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

Classroom space
The District shall ensure a minimum physical distance of six (6) feet between student workspaces, between staff and student workspaces, and between staff workspaces unless public health guidance advises that less distance is safe.

One-way directions/movement
Unidirectional movement through buildings maximizes physical distancing. Accordingly, directional markers as well as physical distancing markers should be used to the extent possible and practicable within each school site/facility.
In-person staff meetings
To the extent required or recommended by then-current public health guidelines, the School shall not offer in-person staff meetings or professional development if the School cannot ensure a maximum of six (6) feet of physical distance between all attendees for the duration of the meeting and for entering/leaving the meetings. In-person attendance shall be encouraged but voluntary; all others must attend virtually, and meetings may be held outdoors if practicable.

Enforcement of physical distancing
All staff, students, parents and community members shall be required to adhere to all applicable social distancing and public health guidelines while present on campus, including but not limited to the wearing of facial coverings and social distancing.

Information regarding applicable guidelines shall be available on the School website. Enforcement of such guidelines will protect the health and safety of staff, students, parents and community members.

Exemptions to physical distancing
In rare situations in a classroom where adherence to minimum physical distancing guidelines is insufficient to provide necessary academic instruction or assessments as mutually agreed to by the staff member and the COVID Coordinator, alternative safety devices as recommended by public health guidelines shall be used such as plexiglass barriers and/or face shields with neck drapes. Time spent in proximity of less than six (6) feet between individuals shall be minimized to the fullest extent possible and encouraged to not exceed ten minutes daily.

Face Coverings
Upon request, we will provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department.

The District shall require the use of facial coverings (“masks”) in accordance with federal, state, and local public health guidelines as may be in effect. Individuals who cannot wear a mask because of a documented health issue shall instead be required to wear a face shield and neck drape (tucked into the shirt).

Masks and face shields may not be required for students with medical apparatus which prevents or obstructs the use of the apparatus.

Staff are expected to report for duty with their own mask consistent with public health guidelines. Should a staff member report for duty without a mask or should a staff member’s mask become unwearable during their duty day, the School shall provide a replacement for the face mask upon request.

CDC approved KN-95 masks will be provided to certificated staff caring closely for individuals with COVID-19 like symptoms. KN-95 masks will be ordered and provided to nurses and other certificated staff caring closely for individuals with COVID-19 like symptoms immediately upon order fulfillment.

CDC approved KN-95 masks will also be provided to custodial workers for general cleaning and disinfecting for COVID disinfection.

The following are exceptions to the use of face coverings in our workplace:

- When an employee is alone in a room.
- While eating and 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 possible.
Employees wearing respiratory protection in accordance with 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. Alternatives will be considered on a case-by-case basis.

Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19.

**Engineering Controls**

We have provided plexiglass barriers that sit on top of each desk in the offices for high-traffic in our school site main office areas.

The School will coordinate with SOMO Village to ensure all HVAC systems operate on the mode which delivers the freshest air changes per hour and open outdoor air dampers to the maximum capacity that an individual HVAC unit can handle without damage. In the majority of classrooms there are HEPA air purifiers.

To minimize the risk of waterborne illnesses, the following steps recommended by the CDC have been taken to ensure that all water systems and features (e.g. sink faucets, drinking fountains) are safe to use after the prolonged facility shutdown. Drinking fountains will be cleaned and sanitized regularly, but staff and students will be encouraged to bring their own water to minimize the use and touching of water fountains.

**Cleaning and disinfecting**

Custodial staff at Credo have been trained in the proper cleaning and disinfecting of classrooms, offices, workspaces, indoor/outdoor common areas, and frequently touched surfaces within the school. Cleaning supplies will continue to be stored away safely.

Schedules will be set up to provide for cleaning and disinfecting during the day and to provide increased cleaning and disinfecting and to disinfect due to COVID. Schedules will be shared with all stakeholders once students return to the campus.

A complete disinfecting will occur on the site for which a positive COVID-19 case was reported. This will include all the exposed and potentially exposed office/work areas on the site, as well as, the restrooms and shared spaces.

**Shared tool, equipment and personal protective equipment (PPE)**

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

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between users by the user with disinfectant wipes or soap and water.

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seat belt buckles, armrests, shifter, etc.) will be disinfected between users by the users of the vehicle.
Hand sanitizing
The School shall comply with the following hand washing logistical requirements:

- Every room with a sink shall be stocked with soap and hand sanitizer,
- Every classroom shall be provided hand sanitizer;
- Non-classroom workspaces shall be provided hand sanitizer;
- Hand sanitizer stations will be placed in a variety of locations through the school campus;
- All hand washing/hand sanitizing supplies noted above or otherwise provided shall be checked and, if depleted, restocked immediately upon notification to the Office Manager.

Staff, students, parents and community members shall be instructed to wash their hands or use hand sanitizer upon entering school and every time a classroom is entered.

Staff, students, parents and community members will be encouraged to cover coughs and sneezes with a tissue. Used tissues should be thrown in the trash and hands washed immediately with soap and water for at least 20 seconds. If soap and water are not available, hand sanitizer should be used.

Personal protective equipment (PPE used to control employees’ exposure to COVID-19)
Credo will evaluate the need for PPE (such as gloves, goggles, masks, 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. [reference section 3205(c)(E) for details on required respirator and eye protection use.]

We provide and ensure use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

INVESTIGATING AND RESPONDING TO COVID-19 CASES
This will be accomplished by using the COVID-19 Diagnosis Flowchart (CDC)

Credo, through the designated COVID-19 Coordinator, will work with the County Health Department through their existing protocols for contact tracing, as needed, and identify whether quarantine of impacted students and staff is necessary. Contacts will be identified based on the duration of the contact, the proximity of the contact, and the number of people.

An employee who had potential COVID-19 exposure in our workplace will be:

- Contacted by the COVID-19 Coordinator with guidance and next steps
- Offered information about COVID-19 testing
- Will be provided information about benefits described in Training and Instruction and Exclusion of COVID-19 Cases below.
SYSTEM FOR COMMUNICATION
Credo's goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and that includes the following information:

- Who employees should report COVID-19 symptoms and possible hazards to, and how.
- 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 required, how employees can access COVID-19 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.
- Information about COVID-19 hazards employees (including other employees 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

Testing is available at various places throughout Sonoma County. A complete list can be found at the following website: https://socoemergency.org/emergency/novel-coronavirus/testing-and-tracing/

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 facts 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.
EXCLUSION OF COVID-19 CASES
Where we have a COVID-19 case in our workplace, we will limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 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 by employer-provided employee sick leave benefits, payments from public sources or other means of maintaining earnings, rights and benefits, where permitted by law and when not covered by workers’ 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 Plan available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- 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
COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:

- 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 have improved.
- At least 10 days have passed since COVID-19 symptoms first appeared.
- COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 tests
- A negative COVID-19 test will not be required for an employee to return to work.
- 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.
APPENDIX A: IDENTIFICATION OF COVID-19 HAZARDS

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

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

**Person Conducting the Evaluation:**

**Date:**

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

<table>
<thead>
<tr>
<th>Interaction, area, activity, work task, process, equipment and material that potentially exposes employee to COVID-19 hazards</th>
<th>Places and Times</th>
<th>Potential for COVID-19 exposure and employees affected, including members of the public and employees of other employers</th>
<th>Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation</th>
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## APPENDIX B: COVID-19 INSPECTIONS

**Date:**

**Name of Person Conducting the Investigation:**

**Work Location Evaluated:**

<table>
<thead>
<tr>
<th>Exposure Controls</th>
<th>Status</th>
<th>Person Assigned to Correct</th>
<th>Date Corrected</th>
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<tbody>
<tr>
<td><strong>Engineering</strong></td>
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<tr>
<td>Barriers/Partitions</td>
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<tr>
<td>Ventilation (amount of fresh air and filtration maximized)</td>
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<tr>
<td>Additional room air filtration</td>
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<tr>
<td><strong>Administrative</strong></td>
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<tr>
<td>Physical distancing</td>
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<tr>
<td>Surface cleaning and disinfection (frequently enough and adequate supplies)</td>
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<tr>
<td>Hand washing facilities (adequate numbers and supplies)</td>
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<tr>
<td>Disinfecting and hand sanitizing solutions being used according to manufacturer instructions</td>
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<td><strong>PPE</strong> (not shared, available and being worn)</td>
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<td>Face coverings (cleaned sufficiently often)</td>
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<td>Face shields/goggles</td>
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APPENDIX C: 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:

Name of Person Conducting the Investigation:

<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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<tr>
<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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<tr>
<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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</table>
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):

| Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of potential COVID-19 exposure to: |
|---|---|
| All employees who may have had COVID-19 exposure and their authorized representatives | Date: | Names of employees that were notified: |
| Independent contractors and other employers present at the workplace during the high-risk exposure period. | Date: | Names of individuals that were notified: |
| What were the workplace conditions that could have contributed to the risk of COVID-19 exposure? | | What could be done to reduce exposure to COVID-19? |
| Was the local health department notified? | Date: |
APPENDIX D: COVID-19 TRAINING ROSTER

Date:

Name of Person Conducting the Training:

<table>
<thead>
<tr>
<th>Employee Name</th>
<th>Signature</th>
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Additional Consideration #1

MULTIPLE COVID-19 INFECTIONS AND COVID-19 OUTBREAKS
(This section will be added to the CPP if our workplace is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in our workplace within a 14-day period. Reference section 3205.1)

This section of the CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 Testing

- We will provide COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period. COVID-19 testing will be provided at no cost to employees during employees’ working hours.

Testing is available at various places throughout Sonoma County. A complete list can be found at the following website: https://socoemergency.org/emergency/novel-coronavirus/testing-and-tracing/

- COVID-19 testing consists of the following:
  - All employees in our exposed workplace will be immediately tested and then tested again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by, the local health department.
  - After the first two COVID-19 tests, we will continue to provide COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
  - We will provide additional testing when deemed necessary by Cal/OSHA.

Exclusion of COVID-19 Cases

We will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with our CPP Exclusion of COVID-19 Cases and Return to Work Criteria requirements, and local health
Investigation of Workplace COVID-19 Illness
We will immediately investigate and determine possible workplace-related factors that contributed to the COVID-19 outbreak in accordance with our CPP Investigating and Responding to COVID-19 Cases.

COVID-19 Investigation, Review and Hazard Correction
In addition to our CPP Identification and Evaluation of COVID-19 Hazards and Correction of COVID-19 Hazards, we will immediately perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19.

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
  - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
  - Our COVID-19 testing policies.
  - Insufficient air filtration.
  - Lack of physical distancing.

- Updating the review:
  - Every thirty days that the outbreak continues.
  - In response to new information or to new or previously unrecognized COVID-19 hazards.
  - When otherwise necessary.

- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review.

We will consider:
- Moving indoor tasks outdoors or having them performed remotely.
- Increasing outdoor air supply when work is done indoors.
- Improving air filtration.
- Increasing physical distancing as much as possible.
- Respiratory protection.

Notifications to the Local Health Department
Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in our workplace, we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.

We will provide to the local health department the total number of COVID-19 cases and for each COVID-19 case, the name, date of birth, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and North American Industry Classification System code of the workplace of the COVID-19 case, and any other information requested by the local health department. We will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace.

Additional Consideration #2 MAJOR COVID-19 OUTBREAKS
(This section will be added should our workplace experience 20 or more COVID-19 cases within a 30-day period. Reference
section 3205.2). This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.