



**City of Vernon, California
Human Resources Policies and Procedures**

Director of Human Resources

City Administrator

Number: VI-3 Effective Date: April, 2021

SUBJECT: COVID-19 PREVENTION PROGRAM (CPP)

I. PURPOSE

The purpose of the City of Vernon’s COVID-19 Prevention Program (“CPP”) is to provide employees a healthy and safe workplace as required under the California Occupational Safety and Health Act (Labor Code §§ 6300, *et seq.*) and associated regulations (8 C.C.R. § 3205).

Nothing in this CPP precludes the City of Vernon from complying with federal, state, or local laws or guidance that recommends or requires measures that are more prescriptive and/or restrictive than are provided herein.

The City’s Director of Human Resources has overall authority and responsibility for implementing the provisions of this CPP in the City of Vernon. 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.

II. SCOPE

This CPP applies to all City of Vernon employees.

III. 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 either: (1) Has a positive “COVID-19 test” as defined in this section; (2) Is subject to COVID-19-related order to isolate issued by a local or state health official; or (3) 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. A person is no longer a “COVID-19 case” when a licensed health care professional determines that the person does not have COVID-19, in accordance with recommendations made by the California Department of Public Health (CDPH) or the local health department pursuant to authority granted under the Health and Safety Code or title 17, California Code of Regulations to CDPH or the local health department.

“Close contact COVID-19 exposure” means being within six (6) feet of a COVID-19 case for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the “high-risk exposure period” as defined here. This definition applies regardless of the use of face coverings.

“COVID-19 hazard” means exposure to 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, sneezing, or procedures performed on persons which may aerosolize saliva or respiratory tract fluids, among other things. This also includes objects or surfaces that may be contaminated with SARS-CoV-2.

“COVID-19 symptoms” means one of the following: (1) fever of 100.4 degrees Fahrenheit or higher or chills; (2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches; (6) headache; (7) new loss of taste or smell; (8) sore throat; (9) congestion or runny nose; (10) nausea or vomiting; or (11) 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 viral test for SARS-CoV-2 that is both: (1) Approved 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; and (2) Administered in accordance with the FDA approval or the FDA Emergency Use Authorization as applicable.

“Exposed workplace” means any work location, working area, or common area at work used or accessed by a COVID-19 case during the high-risk period, including bathrooms, meeting rooms, walkways, hallways, aisles, break or eating areas, and waiting areas.

The exposed workplace does not include buildings or facilities not entered by a COVID-19 case. Effective January 1, 2021, the “exposed workplace” also includes but is not limited to the “worksite” of the COVID-19 case as defined by Labor Code section 6409.6(d)(5).

“Face covering” means a tightly woven double fabric or non-woven material with no visible holes or openings, which covers the nose and mouth and meets the requirements as specified on Section IV.G., Face Coverings of this Policy.

“High-risk exposure period” means the following time period: (1) For persons who develop COVID-19 symptoms: from two (2) days before they first develop symptoms until ten (10) days after symptoms first appeared, and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved; or (2) For persons who test positive who never develop COVID-19 symptoms: from two (2) days before until ten (10) days after the specimen for their first positive test for COVID-19 was collected.

“Potential exposure” means that a COVID-19 case has used or accessed a City worksite or facility (Exposed Workplace).

IV. PROGRAM

A. SYSTEM FOR COMMUNICATING WITH CITY OF VERNON EMPLOYEES

1. Reporting COVID-19 Symptoms, Possible COVID-19 Close Contact Exposures, and Possible COVID-19 Hazards at City of Vernon Worksites and Facilities

City of Vernon policy requires that employees immediately report to their manager, supervisor or to the Department of Human Resources via telephone call, text message, or email, any of the following: (1) the employee’s presentation of COVID-19 symptoms; (2) the employee’s possible COVID-19 close contact exposures; (3) possible COVID-19 hazards at City of Vernon worksites or facilities.

The purpose of the requirement for immediate notification is to allow the City to gather information for close contact tracing and to initialize the necessary follow-up action.

The City of Vernon will not discriminate or retaliate against any City employee who makes such a report.

2. Accommodations Process for City of Vernon Employees with Medical or Other Conditions that put them at Increased Risk of Severe COVID-19 Illness

City of Vernon policy on Reasonable Accommodation for Disabled Applicants and Employees provides for an accommodation process for employees who have a medical or other condition identified by the Centers for Disease Control and Prevention (“CDC”) or the employees’ health care provider as placing or potentially placing the employees at increased risk of severe COVID-19 illness.

[http://www.cityofvernon.org/images/hr/personnel-policies-procedures/Reasonable Accommodation for Disabled Applicants Employees.pdf](http://www.cityofvernon.org/images/hr/personnel-policies-procedures/Reasonable%20Accommodation%20for%20Disabled%20Applicants%20Employees.pdf)

The CDC identifies the following medical conditions and other conditions as placing or potentially placing individuals at an increased risk of severe COVID-19 illness; the CDC

guidance provides that adults of any age with the following conditions are at increased risk of severe illness from the virus that causes COVID-19:

1. Cancer
2. Chronic kidney disease
3. COPD (chronic obstructive pulmonary disease)
4. Heart conditions, such as heart failure, coronary artery disease, or cardiomyopathies
5. Immunocompromised state (weakened immune system) from solid organ transplant
6. Obesity (body mass index [BMI] of 30 kg/m² or higher but < 40 kg/m²)
7. Severe Obesity (BMI ≥ 40 kg/m²)
8. Pregnancy
9. Sickle cell disease
10. Smoking
11. Type 2 diabetes mellitus

The CDC guidance also provides that adults of any age with the following conditions **might be** at an increased risk for severe illness from the virus that causes COVID-19:

1. Asthma (moderate-to-severe)
2. Cerebrovascular disease (affects blood vessels and blood supply to the brain)
3. Cystic fibrosis
4. Hypertension or high blood pressure
5. Immunocompromised state (weakened immune system) from blood or bone marrow transplant, immune deficiencies, HIV, use of corticosteroids, or use of other immune weakening medicines
6. Neurologic conditions, such as dementia
7. Liver disease
8. Overweight (BMI > 25 kg/m², but < 30 kg/m²)
9. Pulmonary fibrosis (having damaged or scarred lung tissues)
10. Thalassemia (a type of blood disorder)
11. Type 1 diabetes mellitus

The City of Vernon will periodically review the following web address in order to account for any additional medical conditions and other conditions that the CDC has identified as

placing or potentially placing individuals at an increased risk of severe COVID-19: <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html>

City of Vernon employees are encouraged to review the list of medical conditions and other conditions provided above in order to determine whether they have such a condition.

To request an accommodation under the City's policy, employees may make a request with their manager, supervisor, or the Department of Human Resources.

3. COVID-19 Testing

The City of Vernon possesses authority to require that employees who report to work at City worksites or facilities be tested for COVID-19.

Where the City of Vernon requires that City employees be tested, the City will inform employees for the reason that testing is required.

The City of Vernon will also inform employees of the possible consequences of a positive COVID-19 test, which may include, but is not limited to, a requirement that employees not report to work during the high-risk exposure period and satisfying the minimum criteria to return to work.

Where the City of Vernon requires testing, the City has adopted policies and procedures that ensure the confidentiality of employees' information and comply with the Confidentiality of Medical Information Act ("CMIA"). Specifically, the City will keep confidential all personal identifying information of COVID-19 cases or persons with COVID-19 symptoms unless expressly authorized by the employee to disclose such information or as otherwise permitted or required under the law.

The City shall provide COVID-19 testing to all City employees who have had close contact COVID-19 exposure in the workplace. Testing shall be made available during the employee's regular working hours, when possible and at no cost to the employee. When testing is provided to employees as a result of having had close contact COVID-19 exposure at work and the testing is not provided during the employee's regular work hours, the employee shall be compensated for time spent testing including travel time. Testing can be coordinated through the employees' supervisor or by contacting the Human Resources Department directly.

Additional testing resources for non-workplace exposures may be accessed by contacting:

- The employees' personal physician
- Los Angeles County Department of Public Health website at <http://publichealth.lacounty.gov/acd/ncorona2019/covidtests/>
- The employee's City of residence website
- Local Urgent Care facilities

Employees in need of testing and who encounter difficulties in securing testing may also contact the City's Human Resources Department for assistance.

4. COVID-19 Hazards

The City will notify employees, and the management of any subcontracted employees, of any potential COVID-19 exposure at a City of Vernon worksite or facility where a COVID-19 case and City and/or subcontracted employees were present on the same day. The City will notify employees of such potential exposures within one (1) business day, in a way that does not reveal any personal identifying information of the COVID-19 case.

The City of Vernon will also notify employees of cleaning and disinfecting measures the City is undertaking in order to ensure the health and safety of the worksite or facility where the potential exposure occurred.

Employee notification will typically be done through email to the employees' City email address.

B. IDENTIFICATION AND EVALUATION OF COVID-19 HAZARDS AT CITY OF VERNON WORKSITES AND FACILITIES

1. Screening Employees for COVID-19 Symptoms

The City of Vernon possesses authority to screen employees or require that employees self-screen for COVID-19 symptoms.

Employees are directed to evaluate their own symptoms before reporting to work and are directed to not report for work if they are experiencing any cold, flu, or COVID-19 related symptoms.

Temperature screening is conducted at centralized worksite access points for all City of Vernon employees and all others who enter City of Vernon facilities.

Individuals who report symptoms, close contacts with known COVID-19 positive individuals within the previous ten (10) days, and/or those with a temperature of 100.4 degrees Fahrenheit or greater are not permitted entry to City facilities.

All employees and those individuals conducting employee screening are required to wear a face covering during the screening and while in all public areas of City facilities, and any area outside of their workstation.

2. Responding to City of Vernon Employees with COVID-19 Symptoms

Should a City of Vernon employee present COVID-19 symptoms during a City of Vernon administered screening or a self-screen, the City will instruct the employee to remain at or return to their home or place of residence and not report to work until such time as the employee satisfies the minimum criteria to return to work.

The employee's supervisor or manager, in coordination with the Department of Human Resources will advise employees of any leaves to which they may be entitled during this isolation period. Remote work may also be considered during this period.

Further, the City of Vernon shall ensure the confidentiality of employees' information and comply with the CMIA, and will not disclose to other employees the fact that the employees presented COVID-19 symptoms or tested positive for COVID-19.

3. City of Vernon's Response to COVID-19 Cases

In the event that a City of Vernon employee tests positive for COVID-19 or are diagnosed with COVID-19 by a health care provider, the City will instruct the employee to remain at or return to their home or place of residence and not report to work until such time as they satisfy the minimum criteria to return to work.

The City will advise employees of any leaves to which they may be entitled during this self-isolation period.

The City will comply with all reporting and recording obligations as required under the law, including, but not limited to, reporting the COVID-19 case to the following individuals and institutions as required based on the individual circumstances: (1) the local health department; (2) Cal/OSHA; (3) employees who were present at a City of Vernon worksite or facility when the COVID-19 case was present; (4) the employee organizations that represent employees at the City of Vernon worksite or facility; (5) the employers of subcontracted employees who were present at the worksite or facility; and (6) the City's workers' compensation plan administrator.

The employee's supervisor or manager and/or the Director of Human Resources will interview the COVID-19 cases in order to ascertain the nature and circumstances of any contact that the employees may have had with other employees during the high-risk exposure period. If it is determined that there were any close contact COVID-19 exposures, those employees will be instructed to remain at their home or place of residence and not report to work until such time as the employees satisfy the minimum criteria to return to work.

The City of Vernon has adopted policies and procedures that ensure the confidentiality of employees' information and comply with the CMIA. Specifically, the City will not disclose to other employees, except for those who have a business/operational need to know, the fact that the employee tested positive for or was diagnosed with COVID-19. Further, the City will keep confidential all personal identifying information of COVID-19 cases or persons unless expressly authorized by the employee to disclose such information or as otherwise permitted or required under the law.

4. Workplace-Specific Identification of COVID-19 Hazards

The City of Vernon conducted a workplace-specific assessment of all interactions, areas, activities, processes, equipment, and materials that could potentially expose employees to COVID-19 hazards.

As part of this process, the City identified places and times when employees and individuals congregate or come in contact with one another, regardless of whether

employees are performing an assigned work task or not, including, for example, during meetings or trainings, in and around entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

As part of this process, the City identified potential workplace exposure to all persons at City worksites and facilities, including employees, employees of other entities, members of the public, customers or clients, and independent contractors. The City of Vernon considered how employees and other persons enter, leave, and travel through City worksites and facilities, in addition to addressing employees' fixed workspaces or workstations.

As part of this process, the City considered all persons, regardless of symptoms or negative COVID-19 test results, as potentially infectious.

5. Maximization of Outdoor Air and Air Filtration

For indoor worksites and facilities, the City of Vernon evaluated how to maximize the quantity of outdoor air and whether it is possible to increase filtration efficiency to the highest level compatible with the worksites and facilities' existing ventilation systems.

6. City of Vernon Compliance with Applicable State and Local Health Orders

The City of Vernon monitors applicable orders and guidance from the State of California, the Los Angeles County Department of Public Health, and the City of Vernon Department of Health and Environmental Control related to COVID-19 hazards and prevention, including information of general application and information specific to the City's location and operations.

The City strives to fully and faithfully comply with all applicable orders and guidance from the State of California, the Los Angeles County Department of Public Health, and the City of Vernon Department of Health and Environmental Control.

7. Evaluation of Existing COVID-19 Prevention Controls and Adoption of Additional Controls

Periodically, the City of Vernon will evaluate existing COVID-19 prevention controls at the workplace and assess whether there is a need for different and/or additional controls.

This includes evaluation of controls related to the correction of COVID-19 hazards, physical distancing, face coverings, engineering controls, administrative controls, and personal protective equipment (PPE).

8. Periodic Inspections

The City of Vernon will conduct periodic inspections of worksites 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.

Each City of Vernon Department shall be responsible for conducting inspections of its worksites as needed, but no less than quarterly, using the COVID-19 Safety Inspection

Form attached to this policy as Appendix A. Inspection reports shall be submitted to Human Resources.

C. INVESTIGATING AND RESPONDING TO COVID-19 CASES IN CITY OF VERNON WORKSITES AND FACILITIES

1. Procedure to Investigate COVID-19 Cases

The City of Vernon has a procedure for investigating COVID-19 cases in the workplace. As provided below, the procedure provides for the following: (1) the verification of COVID-19 case status; (2) receiving information regarding COVID-19 test results; (3) receiving information regarding the presentation of COVID-19 symptoms; and (4) identifying and recording all COVID-19 cases.

2. Response to COVID-19 Cases

As provided above at Section IV.B.3., in the event that a City of Vernon employee tests positive for COVID-19 or is diagnosed with COVID-19 by a health care provider, the employee's supervisor or manager will instruct the employee to remain at or return to their home or place of residence and not report to work until such time as the employees satisfy the minimum criteria to return to work. The Department of Human Resources will provide information to the employee regarding isolation and/or quarantine orders/recommendations consistent with the Los Angeles County Department of Public Health and CalOSHA. Including guidance provided at the following web address:

http://publichealth.lacounty.gov/media/Coronavirus/docs/HOO/HOO_Coronavirus_Blanket_Isolation.pdf

a. Contact Tracing

The employee's supervisor or manager and/or the Department of Human Resources will contact the COVID-19 case in order to ascertain the following information: (1) the date on which the employee tested positive, if asymptomatic, or the date on which the employee first presented COVID-19 symptoms, if symptomatic; (2) the COVID-19 case's recent work history, including the day and time they were last present at a City worksite or facility; and (3) the nature and circumstances of the COVID-19 case's contact with other employees during the high-risk exposure period, including whether there were any close contact COVID-19 exposure.

If it is determined that there were any close contact COVID-19 exposures in the workplace, the Department of Human Resources will contact those identified as close contact employees and instruct them to remain at their home or place of residence and not report to work until such time as the employees satisfy the minimum criteria to return to work.

Information regarding quarantine order/guidelines consistent with those recommended by the Los Angeles County Department of Public Health will be provided to all City employees identified as "close contacts". Including guidance provided at the following web address:

b. Reporting the Potential Exposure to Other Employees

The City of Vernon will comply with all reporting and recording obligations as required under the law, including, but not limited to, reporting the COVID-19 case to the following individuals and institutions as required based on the individual circumstances: (1) employees who were present at a City worksite or facility when the COVID-19 case was present; and (2) subcontracted employees who were present at the City worksite or facility.

c. Leave and Compensation Benefits for Close Contact Exposures

The City of Vernon will provide employees determined to be COVID-19 cases with information regarding COVID-19-related benefits to which the employees may be entitled under applicable federal, state, or local laws. This includes any benefits available under workers' compensation law, the federal Families First Coronavirus Response Act (FFCRA), Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, local governmental requirements, the City's own leave policies, and any applicable memorandum of understanding.

The City will continue to provide and will maintain these employees' earnings, seniority, and all other employee rights and benefits, including the employees' right to their former job status, as if the employees had not been removed from their jobs in accordance with federal and state laws and City of Vernon policies.

The City may require that these employees use employer-provided employee sick leave benefits for this purpose and consider benefit payments from public sources in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers' compensation.

d. Investigation to Determine Whether Workplace Conditions Contributed to COVID-19 Exposure

The City of Vernon will conduct an investigation in order to determine whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure to COVID-19 hazards.

3. Confidential Medical Information

The City of Vernon will protect the confidentiality of the COVID-19 cases, and unless necessary for a limited business/operational purpose, will not disclose to other employees the fact that the employees tested positive for or were diagnosed with COVID-19.

The City will keep confidential all personal identifying information of COVID-19 cases unless expressly authorized by the employees to disclose such information or as otherwise permitted or required under the law.

D. CORRECTION OF COVID-19 HAZARDS AT CITY OF VERNON WORKSITES AND FACILITIES

The City of Vernon will implement effective policies and/or procedures for correcting unsafe or unhealthy conditions, work practices, policies and procedures in a timely manner based on the severity of the hazard.

This includes, but is not limited to, implementing controls and/or policies and procedures in response to the evaluations conducted related to the identification and evaluation of COVID-19 hazards and investigating and responding to COVID-19 cases in the workplace. This also includes implementing controls related to physical distancing, face coverings, engineering controls, administrative controls, and personal protective equipment (PPE).

E. TRAINING AND INSTRUCTION OF CITY OF VERNON EMPLOYEES

1. COVID-19 Symptoms

The City of Vernon provides employees training and instruction on the COVID-19 symptoms, including advising employees of COVID-19 symptoms, which include the following: (1) fever of 100.4 degrees Fahrenheit or higher or chills; (2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches; (6) headache; (7) new loss of taste or smell; (8) sore throat; (9) congestion or runny nose; (10) nausea or vomiting; or (11) diarrhea, unless a licensed health care professional determines the person's symptoms were caused by a known condition other than COVID-19.

The City monitors and adheres to guidance by the CDC concerning COVID-19 symptoms, including guidance provided at the following web address:

<https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>

The City will advise employees in the event that the CDC makes any changes to its guidance concerning such symptoms.

The City provides employees instruction and direction on the importance of not coming to work and obtaining a COVID-19 test if employees have COVID-19 symptoms.

2. City of Vernon's COVID-19 Policies and Procedures

The City of Vernon provides regular updates to employees on the City's policies and procedures to prevent COVID-19 hazards at City worksites and facilities and to protect City employees.

3. COVID-19 Related Benefits

The City of Vernon advised employees of the leaves to which the employees may be entitled under applicable federal, state, or local laws. This includes any benefits available under workers' compensation law, the FFCRA, Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, the City's own leave policies, and leave guaranteed by contract.

Further, when employees require leave or are directed not to report to work by the City, the City will advise the employees of the leaves to which the employees may be entitled for that specific reason.

4. Spread and Transmission of the Virus that Causes COVID-19

The City of Vernon advised its employees 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; that 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 that an infectious person may have no symptoms.

The City further advised employees of the fact that particles containing the virus can travel more than six (6) feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, including hand washing, in order to be effective.

5. Methods and Importance of Physical Distancing, Face Coverings, and Hand Hygiene

The City of Vernon has advised employees of the methods and importance of physical distancing, face coverings, and hand hygiene, including hand washing.

Specifically, the City trained, instructed, and provided written materials (including through emails and postings throughout City facilities), to employees on the importance of frequent hand washing with soap and warm 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.

Further, the City has trained and provided instruction to employees on the proper use of face coverings and the fact that face coverings are not respiratory protective equipment.

F. PHYSICAL DISTANCING

The City of Vernon requires that all employees be separated from other persons by at least six (6) feet, except where the City can demonstrate that six (6) feet of separation is not possible and where there is momentary exposure while persons are in movement.

The City of Vernon has adopted several methods by which it increases physical distancing including, but not limited to, the following: (1) providing employees the opportunity to telework or engage in other remote work arrangements; (2) reducing the number of persons in an area at one time, including visitors; (3) posting visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel; (4) adopting staggered arrival, departure, work, and break times; (5) adjusting work processes or procedures, such as reducing production speed, to allow greater distance between employees; and (6) installing solid partitions where physical distancing is not possible.

When it is not possible for employees to maintain a distance of at least six (6) feet, the City requires individuals to be as far apart as possible.

G. FACE COVERINGS

1. Face Covering Requirement

The City of Vernon provides face coverings to employees and requires that such face coverings are worn by employees and individuals at worksites and facilities.

The City of Vernon adheres to orders and guidance provided by the CDPH, the Los Angeles County Department of Public Health, and the City of Vernon Department of Health and Environmental Control, including as provided at the following web address:

<https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/guidance-for-face-coverings.aspx>

The City's policy on the use of face coverings ensures that they are worn over the nose and mouth when indoors, when outdoors and less than six (6) feet away from another person, and where required by orders from the CDPH, the Los Angeles County Department of Public Health, and/or the City of Vernon Department of Health and Environmental Control.

The City's policy requires that face coverings are clean and undamaged and allows for face shields to be used to supplement, and not supplant face coverings.

It is the City's policy to allow for the following exceptions to the face coverings requirement:

1. When an employee is alone in a room or in a City vehicle.
2. While eating and drinking at the workplace, provided employees are at least six (6) feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
3. Employees wearing respiratory protection in accordance with section 5144 or other title 8 safety orders (8 C.C.R. 5144 is available at the following web address: <https://www.dir.ca.gov/title8/5144.html>) and in accordance with the City's Respiratory Protection Program.
4. 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.
5. Specific tasks which 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 the unmasked employee shall be at least six (6) feet away from all other persons unless unmasked employees are tested at least twice weekly for COVID-19.

2. Required Use of Effective Non-Restrictive Alternative for Employees Exempted from Face Covering Requirement

The City of Vernon requires that employees who are exempted from wearing face coverings due to a medical condition, mental health condition, or disability wear an

effective non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits.

3. Physical Distancing Required If Employee Is Not Wearing Face Covering or Non-Restrictive Alternative

The City requires that any employees 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 (6) feet apart from all other persons unless the unmasked employees are tested at least twice (2x) weekly for COVID-19.

However, the City does not use COVID-19 testing as an alternative to face coverings when face coverings are otherwise required by this section.

4. Prohibition on Preventing Employees from Wearing Face Covering

The City of Vernon does not prevent any employee from wearing a face covering when wearing a face covering is not required by this section, unless wearing a face covering would create a safety hazard, such as interfering with the safe operation of equipment.

5. Communication to Non-Employees Regarding Face Covering Requirement

The City of Vernon has posted signage to inform non-employees that it requires the use of face coverings at all City of Vernon worksites and facilities.

6. Policies to Reduce COVID-19 Hazards Originating from Persons Not Wearing Face Coverings

The City of Vernon has developed COVID-19 policies and procedures to minimize employees' exposure to COVID-19 hazards originating from any person not wearing a face covering, including a member of the public.

These policies include requiring that employees and non-employees wear face coverings at all City worksites and facilities, that City employees wear face coverings at all times, maintain physical distance from persons not wearing a face covering, and observe proper hand hygiene.

H. OTHER ENGINEERING CONTROLS, ADMINISTRATIVE CONTROLS AND PERSONAL PROTECTIVE EQUIPMENT (PPE)

1. Installation of Solid Partitions Where Physical Distancing is Not Possible

At fixed work locations where it is not possible to maintain the physical distancing requirement at all times, the City of Vernon has installed cleanable solid partitions that effectively reduce aerosol transmission between the employees and other persons.

Additionally, solid partitions have been installed at all public counters, in employee break rooms where space may be limited making it difficult to maintain at least six feet between individuals, and at building entry points.

2. Maximization of Outdoor Air

As provided above at Section IV.B.5., for indoor worksites and facilities, the City of Vernon has evaluated how to maximize the quantity of outdoor air.

Further, for City worksites and facilities with mechanical or natural ventilation, or both, the City has maximized the quantity of outside air provided to the extent feasible, except when 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 employees, for instance from excessive heat or cold.

Where possible, natural ventilation of interior spaces is recommended. The City’s HVAC systems operate with filtered fresh air circulation and are set to run 24 hours per day, 7 days per week to provide continuous maximum air circulation and ventilation.

3. Cleaning and Disinfecting Procedures

The City of Vernon has implemented stringent cleaning and disinfecting procedures which include the following:

1. The City regularly cleans and disinfects frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, bathroom surfaces, and steering wheels. The City has informed employees via email communications, of cleaning and disinfection protocols, including the planned frequency and scope of regular cleaning and disinfection.
2. Prohibiting the sharing of personal protective equipment and to the extent feasible, items that employees come in regular physical contact with such as phones, headsets, desks, keyboards, writing materials, instruments, and tools. When it is not feasible to prevent sharing, sharing will be minimized and such items and equipment shall be disinfected between uses by different people. Sharing of vehicles will be minimized to the extent feasible, and high touch points (steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) shall be disinfected between users.
3. Cleaning and disinfection of areas, material, and equipment used by a COVID-19 case during the high-risk exposure period.

Further, the City of Vernon requires that cleaning and disinfecting must be done in a manner that does not create a hazard to employees or subcontracted employees.

4. Evaluation of Handwashing Facilities

In order to protect City employees, the City has evaluated its handwashing facilities in order to determine the need for additional facilities, encourage and allow time for employee handwashing, and provide employees with an effective hand sanitizer.

The City of Vernon encourages employees to wash their hands for at least 20 seconds each time.

Signage has been placed throughout City facilities accessible to employees and the general public containing information regarding the importance and proper methods for handwashing.

The City has provided employees with an effective hand sanitizer and prohibits hand sanitizers that contain methanol (i.e. methyl alcohol).

The City has also placed hand sanitizer on all public counters and in various locations throughout City facilities and worksites for use by City employees and all those who enter City facilities.

5. Personal Protective Equipment (PPE)

The City of Vernon provides PPE for all employees. All employees have been provided, at a minimum, gloves and face coverings (as well as hand sanitizer). The City's central supplies warehouse maintains adequate supplies of PPE available for distribution to City employees through their departments.

The City routinely evaluates the need for PPE, such as gloves, goggles, and face shields, to prevent exposure to COVID-19 hazards and provide such PPE as needed.

In accordance with applicable law, the City evaluates the need for respiratory protection when the physical distancing requirements, as provided herein, are not feasible or are not maintained.

In accordance with applicable law and the City's Respiratory Protection Program, the City will provide and ensure proper use of respirators when deemed necessary by Cal/OSHA through the Issuance of Order to Take Special Action.

In accordance with applicable law, the City will provide and ensure use of eye protection and respiratory protection when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

I. REPORTING, RECORDKEEPING AND ACCESS

1. Reporting COVID-19 Outbreaks to the Local Health Department

In accordance with applicable law, the City of Vernon will report information about COVID-19 outbreaks at the workplace to the Los Angeles County Department of Public Health.

Further, the City will provide any related information requested by the local health department.

2. Reporting Serious COVID-19 Illnesses and Deaths to Cal/OSHA

In accordance with applicable law, the City of Vernon Department of Human Resources will immediately report to Cal/OSHA any serious COVID-19-related illnesses or deaths of City employees occurring at a City worksite or facility or in connection with any employment.

Further, in accordance with applicable law, the City will record any serious work-related COVID-19-related illnesses or deaths.

3. Maintenance of Records Related to the Adoption of the CPP

In accordance with applicable law, the City of Vernon will maintain records of the steps taken to implement this CPP.

4. Availability of the CPP for Inspection

The City of Vernon will provide a copy and make this written CPP available to employees and employee organizations on the City's website.

Further, the City will make this written CPP available to Cal/OSHA representatives immediately upon request.

5. Records Related to COVID-19 Cases

The City of Vernon will keep a record of and track all COVID-19 cases with the following information: (1) employee's name; (2) contact information; (3) occupation; (4) location where the employee worked; (5) the date of the last day at the workplace; and (6) the date of a positive COVID-19 test.

In accordance with the Confidentiality of Medical Information Act (CMIA) and applicable law, the City will keep the employees' medical information confidential.

In accordance with the CMIA and applicable law, the City will make this information available to employees and employee organizations with personal identifying information removed. The City will also make this information available as otherwise required by law.

J. EXCLUSION OF COVID-19 CASES

1. Exclusion of COVID-19 Cases from City of Vernon Worksites and Facilities

The City of Vernon will ensure that COVID-19 cases are excluded from the workplace until the individual satisfies the minimum return to work criteria provided for in Section IV.K.

2. Exclusion of Employees with Close Contact COVID-19 Exposures from City of Vernon Worksites and Facilities

The City of Vernon will exclude employees with close contact COVID-19 exposure from the workplace for 10 days after the last known close contact COVID-19 exposure consistent with CDC and Los Angeles County Department of Public Health guidelines.

Pursuant to CDC guidelines, City of Vernon employees considered to be "critical infrastructure workers" may continue to work following potential exposure to COVID-19 provided they remain asymptomatic. These City employees shall be subject to the following:

- The employee shall self-monitor their temperature and symptoms.
- The City shall continue to conduct temperature checks of these employees prior to them entering any City of Vernon worksite.

- The employee shall wear a face covering at all times while in a City facility for 14 days from the last exposure.
- The employee shall maintain 6 feet apart from all other persons in the workplace as duties permit.
- All areas such as offices, bathrooms, common areas, and shared electronic equipment shall be cleaned and disinfected routinely.
- If the employee becomes sick while at work, they should be sent home immediately.

3. Provision of Benefits to City of Vernon Employees Excluded from Work as a Result of a Positive COVID-19 Test or Diagnosis or a Close Contact COVID-19 Exposure

a. Employees Who Are Able to Telework During Isolation or Quarantine Period

The City of Vernon will allow employees who are able to telework, and are able and available to work, to telework during the isolation or quarantine period. The City will provide these employees their normal compensation for the work that they perform for the City during the isolation or quarantine period.

b. Employees Who Are Unable to Telework During Isolation or Quarantine Period

Employees who are unable to telework during isolation or quarantine periods may be required to use paid sick leave consistent with City policies. The use of other earned or accrued paid leave during this time shall be optional and shall be used in accordance with the City's other leave policies and applicable memorandum of understanding.

For all employees who are subject to an isolation or quarantine because of a COVID-19 case or a close contact COVID-19 exposure, the City of Vernon will maintain the employees' seniority and all other employee rights and benefits, including the employees' right to their former job status, during the isolation or quarantine period.

The City may consider benefit payments from public sources, including under the FFCRA and Labor Code section 248.1 (until December 31, 2020 or longer if FFCRA leave and/or Labor Code section 248.1 leave is extended), in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers' compensation.

4. Adherence with Laws, Policies, and/or Agreements Providing Excluded Employees Greater Protections

The obligations set forth in this section do not limit any other applicable law, City of Vernon policy, or collective bargaining agreement that provides City employees with greater protections or benefits.

5. Provision of Information Concerning Benefits to Excluded Employees

At the time of exclusion, the City will provide the excluded employees the information on benefits to which the employees may be entitled under applicable federal, state, or local laws.

This includes any benefits available under workers' compensation law, the FFCRA, Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, the City of Vernon's own leave policies, and leave guaranteed by contract.

K. RETURN TO WORK CRITERIA

1. Minimum Criteria to Return to Work for Symptomatic COVID-19 Cases

City of Vernon policy requires that COVID-19 cases with COVID-19 symptoms remain at their home or place of residence and not report to any City worksite or facility until they satisfy each of the following conditions:

1. At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications;
2. COVID-19 symptoms have improved; and
3. At least 10 days have passed since COVID-19 symptoms first appeared.

2. Minimum Criteria to Return to Work for Asymptomatic COVID-19 Cases

City of Vernon policy requires that COVID-19 cases who tested positive but never developed COVID-19 symptoms not report to any City worksite or facility until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.

3. COVID-19 Testing Not Required in Order to Return to Work

In accordance with CDC guidance concerning symptom-based strategies for the discontinuation of isolation, the City of Vernon does not require employees submit to a COVID-19 test, or produce a negative COVID-19 test result, in order to return to work.

4. Minimum Criteria to Return to Work for Employees Directed to Self-Quarantine or Isolate by a State or Local Health Official

If employees are subject to an isolation or quarantine order issued by a state or local health official, City of Vernon policy requires that the employees not report to any City worksite or facility until the period of isolation or quarantine is completed or the order is lifted.

If the order did not specify a definite isolation or quarantine period, then the period shall be 10 days from the time the order to isolate was effective.

5. Travel Advisory and Restrictions

If a state or local travel advisory is in effect, employees are expected to adhere to all applicable reporting requirements and safety measures, including self-quarantine or isolation after travel where applicable.

City employees who travel on personal time and are subject to state or local quarantine requirements shall use their own forms of appropriate accrued leave during their absence for this purpose, or seek approval from their supervisor regarding remote work. Employees must notify their supervisor or the Director of Human Resources if they are subject to any travel-related restrictions.

6. Allowance by Cal/OSHA for an Employee to Return to Work

If there are no violations of state or local health officer orders for isolation or quarantine, Cal/OSHA may, upon request, allow employees to return to work on the basis that the removal of employees would create undue risk to a community's health and safety.

In such cases, the City of Vernon will develop, implement, and maintain effective control measures to prevent transmission in the workplace including providing isolation for the employees at the City worksite or facility and, if isolation is not possible, the use of respiratory protection in the workplace.

Additional Resources:

Centers for Disease Control and Prevention

<https://www.cdc.gov/coronavirus/2019-nCoV/index.html>

Los Angeles County Department of Public Health

<http://publichealth.lacounty.gov/>

CalOSHA

<https://www.dir.ca.gov/dosh/coronavirus/>

California Department of Public Health

<https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/Immunization/ncov2019.aspx>

Appendix A: COVID-19 Inspections

This tool is intended to be used to help determine if facilities are using CalOSHA guidance to implement practices and protocols for operating while safeguarding workers and the community from COVID-19

Date of Assessment: _____

Name and Title of person conducting the inspection: _____

Work location evaluated: _____

Exposure Controls	Status No Correction Needed /Correction Needed	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Configured work environment for spacing workers at least 6ft apart			
Use visual cues (e.g., floor markings, and signs) throughout the City facilities to promote physical distancing			
Administrative			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
Temperature check at all City facility entrances			
Staggered shifts, arrival, departure and breaks to promote physical distancing			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
Ensure workers are using appropriate PPE properly.			