



COVID-19 Prevention Program (CPP)

Human Resources
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COVID-19 Prevention Program (CPP) for Life Steps Foundation

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

Date: February 8, 2021

Authority and Responsibility

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

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

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the **Appendix B: COVID-19 Inspections form** 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

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: **By contacting their program's Safety Representative and reporting the potential hazard concerning themselves or others within the workplace environment. All safety representatives will report the hazard to Life Steps Foundation's Human Resources Manager within 24 hours of notice for corrective action.**

Employee screening

We screen our employees by: Those staff working at a company Center-based location or company office by recording temperature screenings, the person conducting the screening is always wearing a mask during the screening procedure, as well as, the employee being screened. The temperature is recorded and kept confidential in accordance with HIPAA regulations, those staff who record a temperature of 100.4 Fahrenheit or higher will be asked to leave the premises immediately and all surfaces directly exposed by the employee will be disinfected. After every use of the thermometer (no touch thermometer) will be disinfected before the next temperature intake.

Those staff who are providing in-home services, it is each individual employees responsibility to contact their supervisor should they be experiencing the following symptoms: fever, cough, tiredness, loss of taste or smell, shortness of breath or difficulty breathing, muscle aches, chills, sore throat, runny nose, headache, chest pain, pink eye (conjunctivitis). Those staff will be advised to stay home until symptoms improve and contact their primary care physician for further medical advice.

In addition, any staff experiencing the following symptoms: fever, cough, tiredness, loss of taste or smell, shortness of breath or difficulty breathing, muscle aches, chills, sore throat, runny nose, headache, chest pain, pink eye (conjunctivitis). Those staff will be advised to stay home until symptoms improve and contact their primary care physician for further medical advice.

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented on the **Appendix B: COVID-19 Inspections** form, and corrected in a timely manner based on the severity of the hazards, as follows:

Employees who have contracted or been exposed to the novel Coronavirus (COVID-19) will need to notify their direct Supervisor. That employee will be advised to get tested if they have not already been tested, they will be recommended to self-isolate until their test results are provided, and to stay home from work until further notice. The employee will be advised to contact their primary care physician for further medical evaluation. In addition, any staff that have been in contact or in the general work location of the infected employee or been exposed within a 14-day calendar period will be notified within 24 hours of the employer's knowledge.

The company will provide local testing facilities within close proximity of the employees work location, free of charge. The company will be responsible for compensating staff for rapid testing and will advise which staff will receive rapid testing on a case-by-case basis due to the nature of the specific incident. All staff who test positive will need to provide their positive test results to secure paid benefits through the company.

Employees classified as essential workers providing necessary services to 24/7 clients and are not able to provide services virtually due to the nature of the work, will be provided N-95 masks and gloves by the company at the work locations who have had an employee contract or been exposed to COVID-19. Employees will be advised to be tested and the company will provide coverage through process of elimination of those staff testing negative and are able to work. Employees who are unable to work at a site that has been introduced to COVID-19 or exposed will need to notify their direct Supervisor and provide written notice to the HR Manager for documenting purposes.

Within the control of the company at owned/leased property sites the company will hire a 3rd party agency to properly clean and disinfect a facility/office/center. That site will remain closed at the company's direction and/or the direction of public health, until deemed safe. Given the nature of the company's operations, cleaning and disinfecting of client's personal homes will be at the discretion of the client. Multiple agencies will be notified to provide appropriate resources for staff to clean, disinfect and will be provided Personal Protective Equipment (PPE).

Control of COVID-19 Hazards

Physical Distancing

Where possible, we ensure at least six feet of physical distancing at all times in our workplace by:

- **Eliminating the need for workers to be in the workplace – e.g., telework or other remote work arrangements.**
- **Reducing the number of persons in an area at one time, including visitors.**
- **Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.**
- **Staggered arrival, departure, work, and break times.**
- **Adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.**

Individuals will be kept as far apart as possible when there are situations where six feet of physical

distancing cannot be achieved.

Face Coverings

We 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. Employees will notify their direct Supervisor the need for additional face coverings, the direct Supervisor will be responsible for coordinating the arrangements for employees to receive the face coverings. The direct Supervisor will also monitor all work locations to ensure face coverings are provided i.e. 24/7 clients.

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.

Cleaning and disinfecting

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

- **Ensuring adequate supplies and adequate time for it to be done properly.**
- **Informing the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection.**

Shared tools, equipment and personal protective equipment (PPE)

PPE must not be shared, e.g., gloves, goggles 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 uses by trained staff who clean with cleaning supplies provided by the company for example Clorox/Lysol wipes, spray etc...

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users. Windows will be lowered at all times for ventilation and all occupants must wear a mask at all times.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- **Evaluating handwashing facilities.**
- **Determining the need for additional facilities.**
- **Encouraging and allowing time for employee handwashing.**

- **Providing employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).**
- **Encouraging employees to wash their hands for at least 20 seconds each time.**

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

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

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

Investigating and Responding to COVID-19 Cases

This will be accomplished by using the **Appendix C: Investigating COVID-19 Cases** form.

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

- **Offered COVID-19 testing at no cost during their working hours.**
- **Rapid testing will be provided on case-by-case at the discretion of the company.**
- **The company will track the employees who have been at one given location of the exposure within 14 days, notice will be provided in 24 hours via phone, text or email.**

System for Communicating

Our goal is committed to providing authoritative information about the nature and spread of infectious diseases, including symptoms and signs to watch for, as well as required steps of communication amongst management and safety representatives to be taken in the event of an illness or outbreak.

Life Steps Foundation Safety Committee Members

Raymond Mercado (Corporate)

Monica Interiano (CAFS SoCal)

Angela Myers (CAFS Lancaster)

Anna Russo (CAFS NorCal)

Karla Salinas (SoCal Adults)

Cynthia Collins (Central Coast Adults)

Margarita Recto (Social Dynamics)

Should any staff member and/or clients be infected or has been exposed to the COVID-19 (coronavirus) they are to report it to management immediately. At which point management will contact a safety representative to report locally, which will then be reported to HR.

Once HR is notified, we will contact management to see who has been in direct contact with that staff member and/or clients for the past 14 days. HR will notify any staff members that may have been exposed via letter, email and verbally to ensure communication. Management will notify the client(s), family members and regional center personnel of the infection or possible exposure. Names of the infected people will not be released per HIPAA.

Staff members and clients will be asked to seek medical attention from their primary care physician and/or local health officials. We will ask for medical documentation for the record, the staff will need to provide

documentation within 15 days. All staff and clients will need to be self-quarantined for 14 days per CDC **(also refer to return-to-work criteria below)**.

HR will contact CAL OSHA or public health if 4 or more staff at one given work location of the exposure due to it being work related and we will have the employee complete workers comp paperwork per company protocol for any work related injury or illness. The employee will be encouraged to submit the paperwork as soon as they can via email (to prevent the spread). HR will also contact public health to report the incident and seek additional resources and guidance.

Training and Instruction

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
 - COVID-19 is an infectious disease that can be spread through the air.
 - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
 - An infectious person may have no symptoms.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

Appendix D: COVID-19 Training Roster will be used to document this training.

Exclusion of COVID-19 Cases

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

- Ensuring that COVID-19 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 allowing employees to take paid sick time for two weeks under the FFCRA*:
 - Full-time 40 hrs. per week: 80 hours of sick time
 - Full-time 35 hrs. per week: 70 hours of sick time
 - Full-time 30 hrs. per week: 60 hours of sick time
 - Part-time 29 hrs. or less per week: Pro-rated based on the average of hours worked in the previous six months, or if newly hired based on the hours agreed upon at the time of hire.
- Company will also provide Paid FMLA at 2/3rds compensation for 12 weeks with the first two weeks not being compensated.

- Providing employees at the time of exclusion with information on available benefits.
- Company will also provide Workers Compensation packet to all employees who test positive by virtue of working directly at a site location at the direction of the company. Hence any virtual employees will not be entitled to worker's compensation benefits.

Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use the **Appendix C: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

Return-to-Work Criteria

- 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 test.
 - 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.
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Raymond Mercado

Raymond Mercado
Human Resources Manager
02/08/2021