

# CA COVID-19 Prevention Program (CPP) Luttrell Staffing California, Luttrell Holdings, LLC, d/b/a Luttrell Staffing Group

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

**Date: Updated January 2023**

## Authority and Responsibility

The Human Resources Department 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.

## What is COVID-19?

Coronavirus disease is an infectious disease caused by severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2), it originated in Wuhan, People's Republic of China in 2019, thus the 19 in COVID-19. Novel coronaviruses are mutations that occur when the virus is transferred from animals (in the case of COVID-19, bats) to humans. It is named for the crown-like spikes on the surface. Because of the globalization of business, COVID-19 spread quickly to all seven continents and in March 2020, the United States had its first National Emergency of the 21st Century and a "Stay-at-home" order was put into place by California Governor Gavin Newsom. Schools (pre-school to higher education), restaurants, beauty salons, etc. were closed to prevent the spread.

Common symptoms of COVID-19 included:

- Fever (100.4 degrees Fahrenheit or higher) or chills; Cough; Shortness of breath or difficulty breathing; Fatigue; Muscle or body aches; Headache; New loss of taste or smell; Sore throat; Congestion or runny nose; Nausea or vomiting; and Diarrhea.

## Identification and Evaluation of COVID-19 Hazards

The following will be implemented in the 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, the workplace.
- Develop COVID-19 policies and procedures to respond effectively and immediately to individuals at the workplace who are a COVID-19 case to prevent or reduce the risk of transmission in the workplace.
- Document the vaccination status of our employees by using **Appendix E: Documentation of Employee COVID-19 Vaccination Status**, which is maintained as a confidential medical record.
- 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 the workplace and the need for different or additional controls.
- Conduct periodic inspections using the **Appendix B: COVID-19 Inspections form** monthly or more frequently due to potential COVID-19 exposure to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with COVID-19 policies and procedures.
- Gloves and masks are readily available for use in each office.
- Sanitizing products are provided for use in each office.

### **Employee participation**

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

- Communicating identified hazards to their direct supervisor or manager on duty.
- Conducting a workspace inspection at the start of each shift and before clocking-out and correcting immediate hazards.
- Wearing face coverings when required by the CDPH or local health department.
- Upholding social distancing requirements.
- Visually observing co-workers for symptoms or failure to follow the COVID-19 plan.

### **Employee screening**

- The Company will screen internal employees by having them self-screen according to [The California Department of Public Health \(CDPH\) guidelines](#).
- Non-contact thermometers are provided for employees to self-check their temperatures or have their temperature checked by a co-worker. Face-coverings are used during screening by both the screener and the employee.

### **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:

- The Company will immediately assess any COVID-19 hazard to determine its severity. Hazards that pose immediate risk to employees' safety and health will be reported and addressed immediately. All other hazards will be reported to Human Resources and addressed within 24 hours.
- Follow-up measures are taken to ensure timely correction. If the Human Resources Department is unable to remediate the COVID-19 hazard immediately, follow-up correspondence with the employee(s) assigned to address the hazard will occur until remediation is complete.

### **Control of COVID-19 Hazards**

#### **Physical Distancing**

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

- In certain circumstances, eliminating the need for workers to be in the workplace – e.g., telework or other remote work arrangements.
- Reducing the number of people in an area at one time, including visitors.
- Staggered arrival, departure, work, and break times.
- Adjusting work processes or procedures such as, if space allows, setting up workspace with 6' distance between employee workstations, installed dividers (plexiglass) in areas to protect employees when interfacing with others (especially receptionist areas), display indicators and posted notices of social distancing in lobbies.
- Keeping individuals as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

#### **Face Coverings**

A "face covering," for the purposes of this COVID-19 Prevention Plan, means a surgical mask, a medical procedure mask, a respirator worn voluntarily, or a tightly woven fabric or non-woven material of at least two layers. A face covering should have no visible holes or openings and must cover the nose and mouth. A face covering does not include a scarf, ski mask, balaclava, bandana, turtleneck, collar, or single layer of fabric. The Company will provide free, clean, undamaged face coverings.

Face coverings are mandatory only when the [CDPH](#) or local health department require their use, regardless of vaccination status. Face coverings are readily available in all offices to provide, free of charge, to internal employees, external employees, and other incoming personnel. Most internal employees prefer to use their own personal face coverings, which is acceptable if they are clean, undamaged, and worn properly. If face coverings do not meet these requirements, the Company will provide acceptable face coverings.

### **Engineering controls**

The following measures will be implemented for situations when at least six feet between individuals cannot be maintained: provide cubicle workspace with a distance of at least 6' from person to person; install divider (usually plexiglass) barriers/partitions between the employee (usually receptionist area) and other individuals.

The Company will maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by:

- Professionally and properly maintaining and adjusting ventilation systems.
- Filters will be changed monthly or quarterly, depending on the environment.

Adhere to all applicable orders and guidance from the State of California and the local health department related to COVID-19 hazards and prevention, including CDPH's Interim Guidance for Ventilation, Filtration, and Air Quality in Indoor Environments.

### **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.

In order to implement effective sanitizing procedures, the Company will:

- Post notices to remind employees to follow CDC guidelines of handwashing.
- Determine the need for additional facilities.
- Ensure sanitizing products are available.
- Encourage and allow time for employee handwashing.
- Provide employees with effective hand sanitizer and regularly assess that hand sanitizer is well-maintained and stocked.
- Encourage employees to wash their hands for at least 20 seconds each occurrence.

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

The Company will 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.

The Company will provide face coverings, gloves and safety glasses as needed. In addition, employees who request additional Personal Protective Equipment will receive training when required by Cal/OSHA.

## **Investigating and Responding to COVID-19 Cases**

Upon report of a Covid positive test, an investigation will promptly be conducted.

See **Appendix C: Investigating COVID-19 Cases.**

## **System for Communicating**

The Company's goal is to ensure there is effective two-way communication with its employees, which includes employees' understanding of and cooperation regarding the following:

- To whom employees should report COVID-19 symptoms and possible hazards.
- How to contact the COO and/or the Human Resources Department for guidance via phone or email.
- How to report symptoms, positive test results, possible close contacts, and COVID-19 hazards in the workplace without fear of reprisal.
- The Company's procedures or policies for accommodating employees with medical or other conditions which increase the risk of severe COVID-19 illness.
- How to access COVID-19 testing.
- Updated contact information, so the Company can communicate in person, by email, text, fax, or

mail.

- Communication of information regarding COVID-19 hazards in accordance with State and Local Law and the Company's COVID-19 policies and procedures.
- Adherence to COVID-19 policies and procedures.

## **Training and Instruction**

The Company will provide effective training and instruction that includes:

- 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.
- Information regarding transmission of Covid-19.
- Social distancing and facecovering protocols as required by the CDPH or the local health department.
- 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.
- The effectiveness of hand sanitizer and reduced effectiveness due to soiled hands.
- Proper use of face coverings and that face coverings are not respiratory protective equipment.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test, and COVID-19 response protocols.

### **Appendix D: COVID-19 Training Roster**

## **Isolation and Quarantine**

All persons with COVID-19 symptoms, regardless of vaccination status or previous infection, should: Self-isolate and test as soon as possible to determine infection status. Knowing one is infected early during self-isolation enables (a) earlier access to treatment options, if indicated (especially for those that may be at risk for severe illness), and (b) notification of exposed persons (close contacts) who may also benefit by knowing if they are infected.

For symptomatic persons who have tested positive within the previous 90 days, using an antigen test is preferred.

Remain in isolation while waiting for testing results. If not tested, they should continue isolating for 10 days after the day of symptom onset, and if they cannot isolate, should wear a well-fitting mask for 10 days.

Consider continuing self-isolation and retesting in 1-2 days if testing negative with an antigen test, particularly if tested during the first 1-2 days of symptoms.

Continue to self-isolate if test result is positive, follow recommended actions below (Table 1), and contact their healthcare provider about available treatments if symptoms are severe or they are at high risk for serious disease or if they have any questions concerning their care.

### **People who test positive for Covid-19**

- Stay home (PDF) for at least 5 days after start of symptoms (or after date of first positive test if no symptoms).
- Isolation can end after day 5 if symptoms are not present or are resolving and a diagnostic specimen\* collected on Day 5 or later tests negative.
- If unable to test, choosing not to test, or testing positive on Day 5 (or later), isolation can end after Day 10 if fever-free for 24 hours without the use of fever-reducing medications.
- If fever is present, isolation should be continued until 24 hours after fever resolves.
- If symptoms, other than fever, are not resolving, continue to isolate until symptoms are resolving or until after Day 10.
- Per CDPH masking guidance, infected persons should wear a well-fitting mask around others for a total of 10 days, especially in indoor settings (see masking section below for additional information).

\*Antigen test preferred.

### **Asymptomatic employees who have been exposed to someone with Covid 19:**

- Test within 3-5 days after last exposure.
- Per CDPH masking guidance, close contacts should wear a well-fitting mask around others for a total of 10 days, especially in indoor settings and when near those at higher risk for severe COVID-19 disease (see masking section below for additional information).

- Strongly encouraged to get vaccinated or boosted.
- If symptoms develop, test and stay home, AND
- If test result is positive, follow isolation recommendations above

### **Employees who have "Close Contact" with a Covid-19 case:**

Close contact is defined as follows: For indoor airspaces of 4000,00 or fewer cubic feet, close contact is sharing the same airspace for a cumulative total of 15 minutes or more over a 24-hour period. For indoor airspaces of greater than 4000,000 cubic feet, close contact is defined as being within six feet of a COVID-19 case for a cumulative total of 15 minutes or more over a 24-hour period during the COVID-19 case's infectious period.

- Exclude from work for at least 5 days, after last exposure.
- Work exclusion can end after Day 5 if symptoms are not present and a diagnostic specimen collected on Day 5 or later tests negative.
- If unable to test or choosing not to test, and symptoms are not present, work exclusion can end after day 10.
- Comply with CDPH masking guidance (i.e., universal masking and, in some cases, where surgical masks or higher filtration respirators may be required).
- Strongly encouraged to get vaccinated or boosted.
- If symptoms develop, stay home and test as soon as possible; AND
- If test result is positive, follow isolation and positive Covid-19 testing guidance.

### **Reporting, Recordkeeping, and Access**

It is the Company's policy to:

- Report information about COVID-19 cases at the workplace to the local health department whenever required by law and provide any related information requested by the local health department.
- Report immediately to the Branch Manager and to the Luttrell Staffing Group Safety Team for immediate notification to Cal/OSHA of 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 the written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make the Company's 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.

### **Multiple COVID-19 Infections and COVID-19 Outbreaks**

The below practices will stay in effect until there are no new COVID-19 cases detected in the exposed group for a 14-day period.

#### **COVID-19 testing**

- The Company will provide COVID-19 testing at no cost to all employees, during paid time, regardless of vaccination status and known exposure. Testing is available to employees who had close contact in the workplace, during outbreaks, and during major outbreaks.
- The Company will continue to comply with the applicable elements of the CPP, as well as the following:
  1. Employees in an exposed group wear face covering when indoors or when outdoors and less than six feet apart (unless one of the face-covering exceptions indicated in our CPP apply).
  2. The Company will give notice to employees in the exposed group of their right to request a respirator for voluntary use.

## **COVID-19 investigation, review, and hazard correction**

The Company 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 is documented and includes:

- Investigation of new or unabated COVID-19 hazards including:
  - The Company leave policies and practices and whether employees are discouraged from remaining homewhen sick.
  - COVID-19 testing policies.
  - Insufficient outdoor air.
  - 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. The Company 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 feasible.
  - Requiring respiratory protection in compliance with section 5144.

## **Buildings or structures with mechanical ventilation**

The Company will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters, if compatible with the ventilation system. If MERV-13 or higher filters are not compatible, filters with the highest compatible filtering efficiency will be used. The Company will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units or other air cleaning systems would reduce the risk of transmission and, if so, implement their use to the degree feasible.

## **Major COVID-19 Outbreaks**

A major outbreak is 20 or more positive cases in a 30-day period.

The below practices will stay in effect until there are fewer than three COVID-19 cases detected in an exposed group for a 14-day period.

The Company will continue to comply with the Multiple COVID-19 Infections and “COVID-19 Outbreaks” policy outlined above, except when COVID-19 testing, regardless of vaccination status, is made available to all employees in the exposed group twice a week or more frequently if recommended by the local health department.

In addition to complying with the Company’s CPP and Multiple COVID-19 Infections and “COVID-19 Outbreaks” Addendum, the Company will also:

- Provide employees in the exposed group with respirators for voluntary use in compliance with section 5144(c)(2) and determine the need for a respiratory protection program or changes to an existing respiratory protection program under section 5144 to address COVID-19 hazards.
- Separate by six feet (except where we can demonstrate that six feet of separation is not feasible and there is momentary exposure while persons are in movement) any employees in the exposed group who are not wearing respirators required by Company policy and used in compliance with section 5144. When it is not feasible to maintain a distance of at least six feet, individuals are as far apart as feasible.
- Install cleanable solid partitions that effectively reduce transmission between the employee and other persons at workstations where an employee in the exposed group is assigned to work for an extended period, such as cash registers, desks, and production line stations, and where the

physical distancing requirement (described above) is not always maintained.

- Evaluate whether to halt some or all operations at the workplace until COVID-19 hazards have been addressed appropriately.
- Implement any other control measures deemed necessary by Cal/OSHA, the CDPH, or other governing organizations.