

COVID-19 Prevention Program

Title 8 Section 3205 (Revised 6/18/2021)

Company Name: FOUR STAR REBAR, INC.

Location: _____

Authority and Responsibility of the COVID-19 Prevention Program:

Mark Spangler has overall authority and responsibility for implementing the provisions of this COVID-19 Prevention Program in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the program in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

This COVID-19 Prevention Program is established to protect employees from workplace COVID-19 hazards in compliance with California Code of Regulation Title 8 §3205. This COVID-19 Prevention Plan is an integrated part of the company's Injury & Illness Prevention Program (IIPP). The company's main priority is the safety, health, and well-being of our staff, contractors, and our community.

All federal, state, and local regulations and directives must be followed, which will be monitored frequently for new requirements.

System for Communicating:

Employees are required to report without fear of reprisal, COVID-19 symptoms, possible COVID-19 exposures, and possible COVID-19 hazards in the workplace.

The company will make every attempt to accommodate employees with medical or other conditions that put them at increased risk of severe COVID-19 illness with modified working conditions. Modified temporary conditions may include a change in job assignment, location, or remote work from home.

COVID-19 testing may be required under specific conditions. If testing is required, the company will inform affected employees of the reason for the COVID-19 testing and the possible consequences of a positive test. Where testing is not required, or provided by the company, employees can access voluntary COVID-19 testing through health plans or local testing centers. Testing will be provided at no cost to the employee during normal working hours. All COVID-19 testing or related medical services provided by the company under this program will be provided in a manner that ensures the confidentiality of the employees and are not disclosed or reported without the employee's express written consent. Information on COVID-19 cases will be provided to the local health department, California Department of Public Health (CDPH), the Division (Cal/OSHA), the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law immediately upon request.

Information about COVID-19 hazards which employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures will be provided during employee training, workplace posting and the company's COVID-19 Prevention Program.

- Indoor locations have been evaluated to maximize ventilation with outdoor air to the highest level of filtration efficiency compatible with the existing ventilation system and whether the use of portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems, would reduce the risk of COVID-19 transmission.
- The company will continually evaluate existing COVID-19 prevention controls at the workplace and the need for different or additional controls.
- The company will conduct periodic inspections, as needed, to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with the company's COVID-19 policies and procedures.

Investigation and Responding to COVID-19 Cases in the Workplace:

All possible COVID-19 exposures will be investigated and documented. The company will treat all persons, regardless of symptoms or negative COVID-19 test results, as potentially infectious. Management will conduct all investigations and medical information will remain confidential. Employees with possible exposure in their work area will be notified of the exposure.

The company will take the following actions when there has been a COVID-19 case at the place of employment:

1. Determine the day and time the COVID-19 case was last present and, to the extent possible, the date of the positive COVID-19 test(s) and/or diagnosis, and the date the COVID-19 case first had one or more COVID-19 symptoms, if any were experienced.
2. Determine who may have had close contact. This requires an evaluation of the activities of the COVID-19 case and all locations at the workplace which may have been visited by the COVID-19 case during the high-risk exposure period.
3. Within one business day of the time the company knew or should have known of a COVID-19 case, the company will give written notice, in a form readily understandable by employees, that people at the worksite may have been exposed to COVID-19. The notice shall be written in a way that does not reveal any personal identifying information of the COVID-19 case. Written notice may include, but is not limited to, personal service, email, or text message if it can reasonably be anticipated to be received by the employee within one business day of sending. The notice will include the disinfection plan required by Labor Code section 6409.6(a)(4). The notice must be sent to the following:
 - a. All employees at the worksite during the high-risk exposure period.
 - b. Independent contractors and other employers at the worksite during the high-risk exposure period.
4. Within one business day of the time the company knew or should have known of the COVID-19 case, the employer shall provide the notice required by Labor Code section 6409.6(a)(2) and (c) to the authorized representative of any employee at the worksite during the high-risk exposure period.
5. Make COVID-19 testing available at no cost, during paid time, to all employees of the company who had a close contact in the workplace and provide them with the information on benefits, with the following exceptions:
 - a. Employees who were fully vaccinated before the close contact and do not have COVID-19 symptoms.

- b. COVID-19 cases who returned to work pursuant to this program and have remained free of COVID-19 symptoms, for 90 days after the initial onset of COVID-19 symptoms or, for COVID-19 cases who never developed symptoms, for 90 days after the first positive test.
6. Investigate whether workplace conditions could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure to COVID-19 hazards.

Personal identifying information of COVID-19 cases or persons with COVID-19 symptoms will be kept confidential. All COVID-19 testing or related medical services provided by the company under this program will be provided in a manner that ensures the confidentiality of employees. COVID-19 testing or related medical services provided by the company will be conducted in a manner that ensures the confidentiality of the employees unless disclosure is required or permitted by law. Information on COVID-19 cases will be provided to the local health department, CDPH, the Division (Cal/OSHA), the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law immediately upon request.

Correction of COVID-19 Hazards:

The company will correct identified 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 evaluations, investigations, and inspections conducted under this program. The identified hazards will be followed up on to ensure timely correction.

Training and Instruction:

The company will provide effective training and instruction to employees that include the following:

1. The company's COVID-19 policies and procedures to protect employees from COVID-19 hazards and how to participate in the identification and evaluation of COVID-19 hazards.
2. Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws. This includes any benefits available under legally mandated sick and vaccination leave, if applicable, workers' compensation law, local governmental requirements, the company's own leave policies, and leave guaranteed by contract.
3. The fact 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.

4. The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing, face coverings, increased ventilation indoors, and respiratory protection decrease the spread of COVID-19, but are most effective when used in combination.
5. Company's policies for providing respirators, and the right of employees who are not fully vaccinated to request a respirator for voluntary use, without fear of retaliation and at no cost to employees. Whenever respirators are provided for voluntary use:
 1. How to properly wear the respirator provided;
 2. How to perform a seal check according to the manufacturer's instructions each time a respirator is worn, and the fact that facial hair interferes with a seal.
6. 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.
7. Proper use of face coverings and the fact that face coverings are not respiratory protective equipment. COVID-19 is an airborne disease. N95s and more protective respirators protect the users from airborne disease while face coverings primarily protect people around the user.
8. COVID-19 symptoms, and the importance of not coming to work and obtaining a COVID-19 test if the employee has COVID-19 symptoms.
9. Company's COVID-19 policies; how to access COVID-19 testing and vaccination; and the fact that vaccination is effective at preventing COVID-19, protecting against both transmission and serious illness or death.
10. The conditions under which face coverings must be worn at the workplace and that face coverings are additionally recommended outdoors for people who are not fully vaccinated if six feet of distance between people cannot be maintained. Employees can request face coverings from the company at no cost to the employee and can wear them at work, regardless of vaccination status, without fear of retaliation.

Physical Distancing: REMOVED

Face Coverings:

The company will provide face coverings and ensure they are worn by employees who are not fully vaccinated when indoors or in vehicles and where required by orders from the CDPH. The company will ensure face coverings are clean and undamaged, and that they are worn over the nose and mouth.

*“Face covering” 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 has 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.*

Face shields are not a replacement for face coverings, although they may be worn together for additional protection.

When employees are required to wear face coverings, the following are exceptions to the face coverings requirement:

1. When an employee is alone in a room or vehicle.
2. While eating or drinking at the workplace, provided employees are at least six feet apart and outside air is supplied to the area, if indoors, has been maximized to the extent feasible.
3. Employees wearing respiratory protection required by the company and in accordance with section 5144 or other title 8 safety orders (Respiratory Protection Standard).
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.

Employees exempted from wearing face coverings due to a medical condition, mental health condition, or disability will wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits it.

Any employee not wearing a face covering, pursuant to the exceptions and not wearing a non-restrictive alternative when allowed, shall be at least six feet apart from all other persons unless the unmasked employee is either fully vaccinated or tested at least weekly for COVID-19 during paid time and at no cost to the employee.

The company will provide face coverings to employees upon request, regardless of vaccination status. The company will not prevent any employee from wearing a face

~~REMOVED The company prohibits the sharing of personal protective equipment (PPE) and to the~~

Areas, material, and equipment used by a COVID-19 case during the high-risk exposure period will be cleaned and disinfected if the area, material, or equipment is indoors and will be used by another employee within 24 hours of the COVID-19 case. PPE and training will be provided to employees conducting the cleaning and disinfecting.

The company has determined we have adequate handwashing facilities. We encourage and allow time for employee handwashing and provide employees with an effective hand sanitizer. The company encourages employees to wash their hands with soap and water for at least 20 seconds each time. Provision or use of hand sanitizers with methyl alcohol is prohibited. Any new location/site will be assessed to ensure that an adequate number of hand washing stations are available.

Protective Equipment (PPE)

The company has evaluated the need for personal protective equipment (PPE) to prevent exposure to COVID-19 hazards, such as gloves, goggles, and face shields, and provide such personal protective equipment as needed.

Upon request, the company will provide respirators for voluntary use in compliance with Title 8 subsection 5144(c)(2) to all employees who are not fully vaccinated and who are working indoors or in vehicles with more than one person. Whenever the company makes respirators for voluntary use available, under this program the company will encourage their use and shall ensure that employees are provided with a respirator of the correct size.

("respirator" means a respiratory protection device approved by the National Institute for Occupational Safety and Health (NIOSH) to protect the wearer from particulate matter, such as an N95 mask)

All personal protective equipment (PPE) is provided by the company at no cost to the employees.

Testing of symptomatic employees. Employers shall make COVID-19 testing available at no cost to employees with COVID-19 symptoms who are not fully vaccinated, during employees' paid time.

Reporting, Recordkeeping, and Access:

The company will adhere to the following:

- 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.
- Record COVID-19 cases as applicable on OSHA Recordkeeping Log.
- Maintain records of the steps taken to implement the company’s 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.
- Keep a record of and track all COVID-19 cases with the employee’s name, contact information, occupation, location where the employee worked, the date of the last day at the workplace, and the date of a positive COVID-19 test.

Exclusion of COVID-19 Cases and employee who had close contact:

The purpose of this subsection is to limit transmission of COVID-19 in the workplace.

The company will ensure that COVID-19 cases are excluded from the workplace until the return-to-work requirements are met.

- The company will exclude from the workplace employees who had close contact until the return-to-work requirements are met, with the following exceptions:
 1. Employees who were fully vaccinated before the close contact and who do not develop COVID-19 symptoms; and
 2. COVID-19 cases who returned to work pursuant to the program and have remained free of COVID-19 symptoms, for 90 days after the initial onset of COVID-19 symptoms or, for COVID-19 cases who never developed COVID-19 symptoms, for 90 days after the first positive test.

- Employees excluded from work under this section, will continue to maintain earnings, seniority, and all other employee rights and benefits. Policy for maintaining earnings benefits:

Exemptions:

- Does not apply where the employees received disability payments or was covered by workers’ compensation and received temporary disability.
- Does not apply where the company demonstrates that the close contact is not work related.
- At the time of the exclusion the company will provide the employee with information on benefits.

Return to Work Criteria:

The company will adhere to the following:

- COVID-19 cases with COVID-19 symptoms will not return to work until:
 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.
- COVID-19 cases who tested positive but never developed COVID-19 symptoms will not be allowed to 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.
- Persons who had a close contact may return to work as follows:
 1. Persons who had a close contact but never developed any COVID-19 symptoms may return to work when 10 days have passed since the last known close contact.

2. Persons who had a close contact and developed any COVID-19 symptom cannot return to work until the requirements of this section criteria have been met, unless all of the following are true:
 - a. The person tested negative for COVID-19 using a polymerase chain reaction (PCR) COVID-19 test with specimen taken after the onset of symptoms; and
 - b. At least 10 days have passed since the last known close contact; and
 - c. The person has been symptom-free for at least 24 hours, without using fever-reducing medications.
- 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 in accordance with the return to work periods as applicable.

Multiple COVID-19 Infections and COVID-19 Outbreaks (§3205.1):

This section applies to a workplace covered by section 3205 if three or more employee COVID-19 cases within an exposed group, as defined by section 3205(b), visited the workplace during their high-risk exposure period at any time during a 14-day period.

This section would apply until there are no new COVID-19 cases detected in a workplace for a 14-day period.

COVID-19 testing

1. The employer shall make COVID-19 testing available at no cost to its employees within the exposed group, during employees' paid time, except:
 - Employees who were not present at the workplace during the relevant 14-day period.
 - Employees who were fully vaccinated before section 3205.1 became applicable to the workplace and who do not have COVID-19 symptoms.
 - For COVID-19 cases who did not develop COVID-19 symptoms after returning to work pursuant to program, no testing is required for 90 days after the initial onset of COVID-19 symptoms or, for COVID-19 cases who never developed symptoms, 90 days after the first positive test.
2. COVID-19 testing will consist of the following:
 - Immediately upon being covered by this program section, testing will be made available to all employees in the exposed group and then again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine, isolation, or exclusion period required by, or orders issued by, the local health department.
 - After the first two COVID-19 tests, the company will make COVID-19 testing available once a week at no cost, during paid time, to all employees in the exposed group who remain at the workplace, or more frequently if recommended by the local health department, until this section no longer applies.
 - The company will provide additional testing when deemed necessary by Cal/OSHA.

The company will continue to comply with all applicable provisions of section 3205, and shall also do the following:

1. Employees in the exposed group shall wear face coverings when indoors, or when outdoors and less than six feet from another person, unless one of the exceptions applies.

2. The company will give notice to employees in the exposed group of their right to request a respirator for voluntary use if they are not fully vaccinated.
3. The company will evaluate whether to implement physical distancing of at least six feet between persons or, where six feet of physical distancing is not feasible, the use of cleanable solid partitions of sufficient size to reduce COVID-19 transmission.

The company will immediately investigate and determine possible workplace related factors that contributed to the COVID-19 outbreak in accordance with Cal/OSHA. In addition, 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 will be documented and will include:

- Investigation of new or unabated COVID-19 hazards including:
 - Leave policies and practices and whether employees are discouraged from remaining home when sick
 - COVID-19 testing policies
 - Insufficient outdoor air
 - Insufficient air filtration
 - Lack of physical distancing
- The review will be updated every thirty days that the outbreak continues, in response to new information or to new or previously unrecognized COVID-19 hazards, or when otherwise necessary.
- The company will implement 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 when possible, increasing outdoor air supply when work is done indoors, improving air filtration, increasing physical distancing as much as feasible, requiring respiratory protection and other applicable controls.

In buildings or structures with mechanical ventilation, employers shall 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 with the ventilation system, employers shall use filters with the highest compatible filtering efficiency. Employers shall 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, shall implement their use to the degree feasible.

The company will continue to give notice to the local health department of any subsequent COVID-19 cases at the workplace.