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# San Mateo County Community College District: Written COVID-19 Prevention Plan

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## Table of Contents

Scope.....	3
Standard Operating Procedure (SOP): System for Communication.....	5
Standard Operating Procedure (SOP): COVID-19 Vaccinations.....	7
Standard Operating Procedure (SOP): Identification and Evaluation of COVID-19 Hazards .....	8
Standard Operating Procedure (SOP): Investigating / Responding to COVID-19 Cases in the Workplace ...	9
Standard Operating Procedure (SOP): COVID-19 Workplace Safety Assessment.....	10
Standard Operating Procedure (SOP): Training and Instruction .....	12
Standard Operating Procedure (SOP): Face Coverings and Personal Protective Equipment (PPE) .....	13
Standard Operating Procedure (SOP): Sanitization and Hygiene.....	15
Standard Operating Procedure (SOP): Reporting, Recordkeeping, and Access .....	16
Standard Operating Procedure (SOP): Return to Work SOP .....	19
Standard Operating Procedure (SOP): Multiple COVID-19 Infections and COVID-19 Outbreaks. ....	20
Standard Operating Procedure (SOP): Major COVID-19 Outbreaks.....	21

## Scope

1. This Plan applies to all employees and places of District employment, with the following exceptions:
  - a. Work locations with one employee who does not have contact with other persons.
  - b. Employees working from home.
  - c. Employees with occupational exposure.
  - d. Employees teleworking from a location of the employee's choice, which is not under the control of the SMCCCD.
2. Nothing in this section is intended to limit more protective or stringent District, state, or local health department mandates or guidance.

## Definitions.

1. **Close contact:** means being within six 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" defined by this section. This definition applies regardless of the use of face coverings.
2. **COVID-19:** means coronavirus disease, an infectious disease caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).
3. **COVID-19 case** means a person who:
  - a. Has a positive "COVID-19 test" as defined in this section;
  - b. Is subject to a COVID-19-related order to isolate issued by a local or state health official; or
  - c. 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
4. **COVID-19 hazard:** means 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, or sneezing, or from procedures performed on persons which may aerosolize saliva or respiratory tract fluids. This also includes objects or surfaces that may be contaminated with SARS-CoV-2.
5. **COVID-19 symptoms:** means fever of 100.4 degrees Fahrenheit or higher, 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, or diarrhea, unless a licensed health care professional determines the person's symptoms were caused by a known condition other than COVID-19
6. **COVID-19 test:** means a viral test for SARS-CoV-2 that is:
  - a. 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
  - b. Administered in accordance with the FDA approval or the FDA Emergency Use Authorization as applicable
7. **Exposed group** means all employees at a work location, working area, or a common area at work, where an employee COVID-19 case was present at any time during the high-risk exposure period. A common area at work includes bathrooms, walkways, hallways, aisles, break or eating areas, and waiting areas. The following exceptions apply:
  - a. For the purpose of determining the exposed group, a place where persons momentarily pass through without congregating, is not a work location, working area, or a common area at work.
  - b. If the COVID-19 case was part of a distinct group of employees who are not present at the workplace at the same time as other employees.

- c. If the COVID-19 case visited a work location, working area, or a common area at work for less than 15 minutes during the high-risk exposure period. NOTE: An exposed group may include the employees of more than one the SMCCCD. See Labor Code sections 6303 and 6304.1. (8)
8. **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. Surgical masks or higher-level respirators (e.g., N95s, KN95s, KF94s) with good fit are recommended.
9. **Fully vaccinated** means that SMCCCD has documented that the person received, at least 14 days prior, either the second dose in a two-dose COVID-19 vaccine series or a single-dose COVID-19 vaccine. Vaccines must be FDA approved; have an emergency use authorization from the FDA; or, for persons fully vaccinated outside the United States, be listed for emergency use by the World Health Organization (WHO).
10. **High-risk exposure period:** means the following time period:
  - a. For COVID-19 cases who develop COVID-19 symptoms: from two days before they first develop symptoms until all of the following are true: it has been at minimum 5 days since after symptoms first appeared, 24 hours have passed with no fever, without the use of fever-reducing medications; and symptoms have improved.
  - b. For COVID-19 cases who never develop COVID-19 symptoms from two days before until at minimum 5 days after the specimen for their first positive test for COVID-19 was collected.
11. **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 filtering facepiece respirator.
12. **Worksite:** for the limited purposes of COVID-19 prevention regulations only, means the building, store, facility, agricultural field, or other location where a COVID-19 case was present during the high-risk exposure period. It does not apply to buildings, floors, or other locations of the SMCCCD that a COVID-19 case did not enter.

## Standard Operating Procedure (SOP): System for Communication

### *Background*

The SMCCCD values transparency in communication, both internally, and to the community. Due to the number of coronavirus disease 2019 (COVID-19) cases among select non-healthcare critical infrastructure employees across the country, the U.S. Centers for Disease Control and Prevention (CDC) is working with the SMCCCDs to ensure employees have available accurate, actionable, and timely disease prevention and control information. This communications plan shall adhere to Cal-OSHA stipulations, and align with the SMCCCD Crisis Communications Plan. The SMCCCD shall communicate to all employees the following:

- How to report COVID-19 symptoms, possible close contacts and hazards to the SMCCCD without fear of reprisal
- COVID-19 hazards in the workplace and the SMCCCD's policies and procedures to address them (See Workspace Assessment)
- Best practices for preventing the transmission of COVID-19, including information on respirators (See PPE)
- When and how employees can request a respirator (See PPE)
- That employees may wear face coverings at work, regardless of their vaccination status, without fear of retaliation by their the SMCCCD (See PPE)
- How employees with elevated risk factors for COVID-19, which can be found on the CDC's website, can request accommodations from their the SMCCCD
- How the employee can obtain testing for COVID-19, such as through the SMCCCD's workplace-based testing program, or through the local health department, a health plan, or at a community testing center (See Testing)
- Notice of potential exposure to COVID-19 (See Responding to Presence of COVID)
- How to participate in workplace hazard identification and evaluation (See Space Assessment)
- Information regarding COVID-related benefits to which the employee may be entitled under federal, state or local laws

### Procedure

- I. Notifications to prevent COVID-19 Spread (How to report COVID-19 symptoms, possible close contacts and hazards to the SMCCCD without fear of reprisal)
  - a. SMCCCD shall utilize the District Public Information Officer to communicate public information
    - i. The Public Information Officer (PIO) shall notify the campus community through:
      1. Posting to the SMCCCD COVID Website
      2. District/College Wide Communications
      3. Direct personal communications through voice calls/face to face communications
    - ii. The COVID-19 Health Officer (CHO) shall:
      1. Ensure current and relevant guidance for symptomatic presentation, COVID-19 positive individuals and exposure monitoring for clusters of transmission (3 or more) within a workgroup
      2. Communicate to the Emergency/Risk Manager any complicating factors
  - b. SMCCCD employees are requested to report per protocol COVID-19 symptoms, possible exposures, and possible hazards at the workplace. All District occupants must conduct self-health screenings prior to entering District properties (See Health Screening).
    - i. No employee/student shall be stigmatized for communicating a possible C-19 illness
      1. Supervisors are responsible for protecting their subordinates

- 2. Faculty are responsible for protecting their students
    - 3. Retaliation for self-reporting constitutes harassment
  - ii. All health-related communications are bound by HIPAA privacy provisions
  - iii. All conflicts in the reporting structure must be communicated to the Emergency/Risk Manager
- II. Notification Procedures
  - a. Possible Exposures
    - 1. Notification guidance for possible exposure is provided via the [SMCCCD Decision tree](#) in alignment with CDC and CDPH guidelines
  - ii. Notification of the SMCCCD COVID-19 Prevention Program
    - 1. All employees shall be trained on the most current health & safety protocols
    - 2. Training (see Training SOP) may be delivered by:
      - a. Safe Colleges and/or other approved SMCCCD platforms
      - b. Town Halls
      - c. Department specific training
    - 3. Training records shall be maintained by the Office of Emergency Management (OEM) and Human Resources
    - 4. Discrepancies in the HSP shall be communicated to supervising personnel, and forwarded to the Emergency/Risk Manager
    - 5. Emergency/Risk Manager shall apply due diligence to ensure HSP is current and communicated to SMCCCD personnel through the District Public Information Officer
    - 6. Instructions for return to work, isolation, and pay/benefits agreements shall be provided by the SMCCCD
  - b. Procedures for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness
    - i. SMCCCD shall communicate policies and procedures that accommodate employees with medical or other conditions that put them at increased risk of severe COVID-19 illness
    - ii. Employee specific needs must be conveyed to effectuate appropriate accommodation.
      - 1. Accommodation requests shall be requested through the chain of supervision
      - 2. Accommodation requests shall be approved through Human Resources in collaboration with the District Emergency/Risk Manager
    - iii. SMCCCD will make every attempt to accommodate their employees without endangering the safety of other SMCCCD personnel.

## Standard Operating Procedure (SOP): COVID-19 Vaccinations

On October 26, 2022, the San Mateo County Community College District Board of Trustees suspended the COVID-19 Vaccination Requirement ([Board Policy 2.90](#)), effective immediately. The District no longer requires COVID-19 vaccination documentation or medical/religious exemptions for any individual. **Employees, students, and the broader community may now access district facilities and in-person services regardless of vaccination status.**

SMCCCD continues to recommend staying up to date with [COVID-19 vaccines, including boosters](#) regardless of risk factors. For additional information, visit the [SMCCCD vaccine information](#) site.

## **Standard Operating Procedure (SOP): Identification and Evaluation of COVID-19 Hazards**

The below requirements set forth to identify and evaluate COVID-19 Hazards are explicated throughout various standard operating procedures (SOPs) within this written prevention program. For sake of avoiding duplicating sections, the below scope will assist the reader in procuring applicable procedures within the other SOPs

### *Requirements:*

1. The SMCCCD shall allow for employee and authorized employee representative participation in the identification and evaluation of COVID-19 hazards.
  - a. (See Workplace Assessment SOP)
2. The SMCCCD shall develop and implement a process for screening employees for and responding to employees with COVID-19 symptoms. The SMCCCD may ask employees to evaluate their own symptoms before reporting to work.
  - a. (See Health Screening SOP)
3. The SMCCCD shall 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 of COVID-19 in the workplace.
  - a. (See Responding to the Presence of COVID-19)
4. The SMCCCD shall conduct a workplace-specific identification of all interactions, areas, activities, processes, equipment, and materials that could potentially expose employees to COVID-19 hazards. SMCCCD shall treat all persons, regardless of symptoms or negative COVID-19 test results, as potentially infectious.
  - a. (See Workspace Assessment SOP)
5. For indoor locations, the SMCCCD shall evaluate how to maximize the quantity ventilation with outdoor air, 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.
  - a. (See Workspace Assessment SOP)
6. The SMCCCD shall review applicable orders and guidance from the State of California and the local health department related to COVID-19 hazards and prevention. These orders and guidance are both information of general application, including Interim guidance for Ventilation, Filtration, and Air Quality in Indoor Environments by the California Department of Public Health (CDPH), and information specific to the SMCCCD's industry, location, and operations.
  - a. (See Workspace Assessment SOP)
7. The SMCCCD shall evaluate existing COVID-19 prevention controls at the workplace and the need for different or additional controls.
8. The SMCCCD shall conduct periodic inspections as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with the SMCCCDs' COVID-19 policies and procedures.
  - a. The SMCCCD Emergency/Risk Manager shall be responsible for inspecting work spaces
  - b. (See Workspace Assess SOP)

## Standard Operating Procedure (SOP): Investigating and Responding to COVID-19 Cases in the Workplace

### *Background*

The [Center for Disease Control and Prevention \(CDC\)](#) and [California Department of Public Health](#) no longer require or recommend case investigation or contact tracing except in high risk settings. School settings do not fall under a high-risk category. Isolation and exposure guidance continue to be supported and recommended.

Based on these changes in investigation and contact tracing, the District provides an [online process](#) that aligns with current CDC and SMCPH recommendations and now focuses on providing guidance to students and employees.

The COVID-19 Health Officer (CHO) will monitor reported COVID-19 cases for any cluster (three or more) transmission patterns and perform follow-up investigation to confirm and apply any appropriate mitigation strategies. (See Reporting, Record Keeping, Access SOP)

### *Procedure*

Employees and students are directed to report a COVID-19 positive result via the online portal: <https://smccd.edu/return-to-campus/covid-positive-result.php>

Once individuals report, they will be emailed and requested to follow recommended guidance isolation. Individuals are also guided to identify their potential infectious period and recommend notification of any individuals who meet the definition of exposure.

The SMCCCD [isolation/exposure decision tree](#) provides current guidance aligned with CDC and CDPH recommendations.

### *Correction of COVID-19 Hazards*

The SMCCCD shall implement effective policies and/or procedures for correcting unsafe or unhealthy conditions, and work practices in a timely manner based on the severity of the hazard. (See Workplace Safety Assessment SOP)

# Standard Operating Procedure (SOP): COVID-19 Workplace Safety Assessment

## Purpose

The Workspace Assessment SOP shall fulfill stipulations set forth by CALOSHA (Section 30205) to include:

- Employee participation in evaluation of COVID-19 hazards
- The SMCCCD shall conduct a workplace-specific identification of all interactions for potential exposure (***workspace assessment***)
- For indoor locations, the SMCCCD shall evaluate how to maximize the quantity of outdoor air and whether it is possible to increase filtration efficiency to the highest level compatible with the existing ventilation system
- Adhere to applicable orders and guidance from the State of California and the local health department
- The SMCCCD shall conduct periodic inspections as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with SMCCCDs' COVID-19 policies and procedures.

The Facilities Department has done the following

- enhance airflow and ventilation to all spaces on campus
- enhance filtration
- make available hand sanitizer and sanitizing wipes

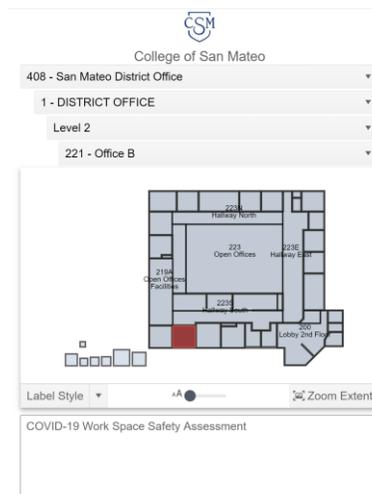
## Procedure

**Request an Assessment:** *To request a safety assessment of your workspace, please*

1. Communicate your need for a work space safety assessment request with your immediate supervisor and secure your supervisor's approval. Submit a Facilities work order via the Facilities Helpcenter located on the SMCCD portal page: <https://smccd.edu/portal/>
2. In the "Request description" box please note: COVID-19 Work Space Safety Assessment



The image shows a login form for the Facilities Helpcenter. At the top is a header image with a blue geometric pattern and a yellow hard hat. Below the image is the text "Facilities Helpcenter". There are two input fields: "username" with "@smccd.edu" as a placeholder and "email password". A "Login" button is located at the bottom right of the form.



## Facilities Response:

Facilities will respond to the work order and schedule a meeting with the requestor. As part of the site visit, Facilities will

1. Ensure that sanitization materials are provided and easily accessible
2. Review ventilation and filtration performance and adjust to increase outside air where feasible

- a. For buildings with mechanical or natural ventilation, or both, the SMCCCD shall maximize the quantity of outside air provided to the extent feasible, with the following exemption:
  1. When the United States Environmental Protection Agency (EPA) Air Quality Index is
    - Greater than 100 for any pollutant
    - If opening windows or letting in outdoor air by other means would cause a hazard to employees (excessive heat or cold)
  2. In buildings or structures with mechanical ventilation, SMCCCD 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, SMCCCDs shall use filters with the highest compatible filtering efficiency.
  3. SMCCCD 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 shall implement their use to the degree feasible
3. Provide signage that complies with current OSHA, CDC, and San Mateo County Health Department requirements
4. If a workspace cannot be amended to reduce COVID-19 hazards, or opening exterior windows/increasing ventilation exposes occupants to smoke or other hazards, the SMCCCD may:
  - a. Relocate employee to facility work location with improved climate controls temporarily.
    - i. Must have approval from:
      1. Supervisor
      2. Facility Manager/Director
      3. District Safety Officer
      4. College VPA and Dean
  - b. Allow for remote work (follow internal approval processes)

***Evaluation of Completed Work Space Assessment***

Provide Feedback: The Facilities work order system will generate an email requesting feedback and confirmation that the work was completed. Please conclude the process by submitting feedback to the Facilities team.

## Standard Operating Procedure (SOP): Training and Instruction

### Background

The SMCCCD values worker health and safety, and is dedicated to provide OSHA required training, instruction to reduce vulnerabilities, and general information related to COVID-19. Therefore, the SMCCCD has created training and instruction, provided on the SafeColleges platform, Townhalls, Manager Forums, and Safety Committees to include:

1. The SMCCCD'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.
  - a. See COVID-19 Workplace Safety Assessment SOP
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 SMCCCD's own leave policies, and leave guaranteed by contract, and this section
3. The SMCCCD's policies for providing respirators, and the right of employees to request a respirator for use without fear of retaliation and at no cost to employees
4. 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.
5. 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.
6. COVID-19 symptoms, and the importance of not coming to work and obtaining a COVID-19 test if the employee has COVID-19 symptoms.
7. Information on the SMCCCD'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.
  - a. See Vaccination SOP
8. The conditions under which face coverings must be worn at the workplace. Employees can request face coverings from the SMCCCD at no cost to the employee and can wear them at work, regardless of vaccination status, without fear of retaliation.

## Standard Operating Procedure (SOP): Face Coverings and Personal Protective Equipment (PPE)

The San Mateo County Community College District is utilizing the Centers for Disease Control and Prevention COVID Community Level coding system.

The updated masking requirements, as outlined below, are effective until further notice, and apply to all students, employees, and visitors, regardless of vaccination status.

CDC COVID Community Level	SMCCCD Face Masking Requirement	Additional CDC Guidance
LOW	Face mask is recommended, but not required	<ul style="list-style-type: none"> <li>Stay up to date with COVID-19 vaccines</li> <li>Get tested if you have symptoms</li> </ul>
MEDIUM	Face mask is required while indoors in any District facility	
HIGH	Face mask is required while indoors in any District facility	

- SMCCCD shall provide face coverings (surgical masks) and N95 respirators to all employees. The District will ensure they are worn when indoors, or in district vehicles while the face covering mandate is in effect. A HEPA filter respirator (N95)\* will be provided for voluntary use.
- SMCCCD shall ensure that required face coverings are clean and undamaged, and that they are worn over the nose and mouth. 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 exemptions apply:
  - When working alone in a closed office or room
  - While eating or drinking at the workplace.
  - When wearing respirators required by the SMCCCD
  - Those 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.
  - 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 shall wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits it.
- The SMCCCD shall not prevent any employee from wearing a face covering when not required by this section, unless it would create a safety hazard, such as interfering with the safe operation of equipment.
- The SMCCCD shall implement measures to communicate to non-employees the face coverings requirements on District grounds.
  - Face Covering Signage shall be posted in all District facilities, and all occupied District locations

\* Employees will be provided instruction on proper use and care of N95 respirators. The need to replace a respirator varies with use and environment. Filtering facepiece respirators are disposable respirators that cannot be cleaned or disinfected. They must be replaced if they get damaged, deformed, dirty, or difficult to breathe through. Employers should follow the manufacturer's instructions. Voluntary use of N95 respirators does not require additional mask fit testing procedures.

**PPE Distribution Process:**

Surgical masks and N95 respirators are located at the entrances of occupied buildings and are available through and the public safety offices.

\*\* Training materials:

N95 don/doff video: <https://www.youtube.com/watch?v=oU4stQgCtV8&t=1s>

N95 don/doff document:  [https://smccd-my.sharepoint.com/:b:/g/personal/hernandezr\\_smccd\\_edu/Ea22CjmD7CNFu6m0RFDM-vgBygM6SffST7pzHSwwp9xSzw?e=XluUyJ](https://smccd-my.sharepoint.com/:b:/g/personal/hernandezr_smccd_edu/Ea22CjmD7CNFu6m0RFDM-vgBygM6SffST7pzHSwwp9xSzw?e=XluUyJ)

## **Standard Operating Procedure (SOP): Sanitization and Hygiene**

Cal-OSHA requires written prevention plans for COVID-19 to include engineering controls, administrative controls, and personal protective equipment. The following Sanitization and Hygiene SOP applies to the SMCCCD's administrative controls to mitigate the spread of COVID-19. The CDC has determined that COVID-19 is predominantly transmitted via aerosolized droplets from person to person. However, effective cleaning and disinfecting may contribute to the slowing of COVID-19 virus transmission.

The District's regular cleaning processes incorporate various CDC recommended cleaning techniques that reinforce disinfection mitigation strategies for COVID-19 as well as other microbes. The SMCCCD implemented cleaning and disinfecting procedures, which include regularly cleaning and disinfecting frequently touched surfaces and objects, such as doorknobs, elevator buttons, handrails, handles, and bathroom surfaces.

Placed in community locations on campus, the Facilities department provides hand sanitizer and sanitizing wipes for use by campus occupants. Hand sanitizer, sanitizing wipes, paper towels may be requested through the Facilities work order system.

The District uses sanitizers and disinfects in alignment with the Environmental Protection Agency's list of Disinfectants for Use Against SARS-CoV-2 (COVID-19): <https://www.epa.gov/coronavirus/list-n-advanced-search-page-disinfectants-coronavirus-covid-19>

## Standard Operating Procedure (SOP): Reporting, Recordkeeping, and Access

### Purpose

This standard operating procedure provides updated interim guidance to the COVID-19 Health Officer (CHO), for the recording of occupational illnesses, specifically cases of COVID-19. This guidance is intended to be time-limited to the current COVID-19 public health crisis. Because of the difficulty with determining work-relatedness, OSHA is exercising enforcement discretion to assess SMCCCD's efforts in making work-related determinations.

Under OSHA's recordkeeping requirements, COVID-19 is a recordable illness, and thus SMCCCD is responsible for recording cases of COVID-19, if:

1. The case is a confirmed case of COVID-19, as defined by the Centers for Disease Control and Prevention (CDC)
2. The case is work-related
3. The case involves one or more of the general recording criteria

### Definitions

- 29 CFR Part 1904: Recording and Reporting Occupational Injuries and Illness
- **Note to § 1904.0:** Recording or reporting a work-related injury, illness, or fatality does not mean that the SMCCCD or employee was at fault, that an OSHA rule has been violated, or that the employee is eligible for workers' compensation or other benefits.
- 29 CFR § 1904.5: Determination of work-relatedness
- 29 CFR § 1904.7: General Recording Data

### Procedure

#### Determination of Work-Related COVID Exposures

In determining whether SMCCCD has complied with this obligation and made a reasonable determination of work-relatedness, COVID-19 Health Officer (CHO) will apply the following considerations:

- **The reasonableness of the SMCCCD's investigation into work-relatedness.** SMCCCD should not be expected to undertake extensive medical inquiries, given employee privacy concerns and SMCCCD's lack of expertise in this area.
- **The evidence available to the SMCCCD.** The evidence that a COVID-19 illness was work-related should be considered based on the information reasonably available to SMCCCD at the time it made its work-relatedness determination.
- **The evidence that a COVID-19 illness was contracted at work.** The CHO should consider all reasonably available evidence, in the manner described above, to determine whether SMCCCD has complied with its recording obligation. This cannot be reduced to a ready formula, but certain types of evidence may weigh in favor of or against work-relatedness. For instance:
  - COVID-19 illnesses are likely work-related when several cases develop among workers who work closely together and there is no alternative explanation.
  - An employee's COVID-19 illness is likely work-related if it is contracted shortly after lengthy, close exposure to a particular customer or coworker who has a confirmed case of COVID-19 and there is no alternative explanation.
  - An employee's COVID-19 illness is likely work-related if his/her job duties include having frequent, close exposure to the general public in a locality with ongoing community transmission and there is no alternative explanation.
  - An employee's COVID-19 illness is likely not work-related if (s)he is the only worker to contract COVID-19 in her vicinity and her job duties do not include having frequent contact with the general public, regardless of the rate of community spread.

- An employee's COVID-19 illness is likely not work-related if he, outside the workplace, closely and frequently associates with someone (e.g., a family member, significant other, or close friend) who (1) has COVID-19; (2) is not a coworker, and (3) exposes the employee during the period in which the individual is likely infectious.
- The CHO should give due weight to any evidence of causation, pertaining to the employee illness, at issue provided by medical providers, public health authorities, or the employee herself.

If, after the reasonable and good faith inquiry described above, SMCCCD cannot determine whether it is more likely than not that exposure in the workplace played a causal role with respect to a particular case of COVID-19, SMCCCD does not need to record that COVID-19 illness. In all events, it is important as a matter of worker health and safety, as well as public health, for SMCCCD to examine COVID-19 cases among workers and respond appropriately to protect workers, regardless of whether a case is ultimately determined to be work-related.

### Reporting Procedure

The [Center for Disease Control and Prevention \(CDC\)](#) and [California Department of Public Health \(CDPH\)](#) no longer require or recommend case investigation or contact tracing except in high risk settings. School settings do not fall under a high-risk category. Isolation and exposure guidance continue to be supported and recommended.

Based on these changes in contact tracing, the District provides an online process that aligns with current CDC and SMCPH recommendations and now focuses on providing guidance to campus individuals students and employees.

Employees and students are directed to report a COVID-19 positive result via the online portal: <https://smccd.edu/return-to-campus/covid-positive-result.php>

Once individuals report, they will be emailed and requested to follow recommended guidance for 5-10 day isolation. Individuals are also guided to identify their potential infectious period and notify any individuals who meet the definition of exposure.

The SMCCCD [isolation/exposure decision tree](#) provides current guidance aligned with CDC and CDPH recommendations.

The COVID-19 Health Officer (CHO) will monitor reported cases for any cluster transmission patterns and perform follow-up investigation to confirm and apply any appropriate mitigation strategies.

### Record Keeping

The SMCCCD shall maintain records of the steps taken to implement the written COVID-19 Prevention Program. The written COVID-19 Prevention Program shall be made available at the workplace to employees, authorized employee representatives, and to representatives of the District immediately upon request. The COVID-19 Safety Officer is responsible for maintaining records and keeping track of all COVID-19 cases in alignment with HIPPA regulations.

- Confidentiality is maintained and information is discussed and shared consistent with HIPPA regulations

- Documentation of COVID-19 cases is maintained applying HIPPA compliant processes and includes the following information
  - Employee's name
  - Contact information
  - Occupation
  - Employee workgroup location
  - Date of a positive COVID-19 test
  - Notes specific to case conditions

### Record Access

Medical record access is available following HIPPA regulations. Information shall be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

## Standard Operating Procedure (SOP): Return to Work SOP

1. COVID-19 cases with COVID-19 symptoms and/or COVID-19 positive test shall return to work when they have met conditions for isolation guidance ([see decision tree](#))
2. Persons who had a close contact can follow guidance for self-assessment recommendations (see [decision tree](#))

[SMCCCD Isolation, Quarantine, Exposure Decision Tree](#)

## **Standard Operating Procedure (SOP): Multiple COVID-19 Infections and COVID-19 Outbreaks.**

### Scope

This section applies to a workplace which has been identified as a location where there are three or more employee COVID-19 cases visited the workplace during their high-risk exposure period at any time during a 14-day period.

### Procedure

1. COVID-19 Testing
  - a. The SMCCCD shall make COVID-19 testing available at no cost to its employees within the exposed group, during employees' paid time, except:
    - i. Employees who were not present at the workplace during the relevant 14-day period(s)
    - ii. Employees who were fully vaccinated and who do not have COVID-19 symptoms.
  - b. COVID-19 testing shall consist of the following:
    - i. Testing shall 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 shall not impact the duration of any quarantine, isolation, or exclusion period required by, or orders issued by, the local health department.
    - ii. The SMCCCD shall 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.
  - c. The SMCCCD shall make additional testing available at no cost to employees, during employees' paid time, when deemed necessary by the District through the Issuance of Order to Take Special Action, in accordance with title 8, section 332.3 of CAL-OSHA.
2. The SMCCCD shall 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 shall be documented and include:
  - a. Investigation of new or unabated COVID-19 hazards including the SMCCCD's leave policies and practices and whether employees are discouraged from remaining home when sick; the SMCCCD's COVID-19 testing policies; insufficient outdoor air; insufficient air filtration; and lack of physical distancing.
  - b. The review shall be updated every 30 days that this section continues to apply, in response to new information or to new or previously unrecognized COVID-19 hazards, or when otherwise necessary.
3. The SMCCCD shall implement applicable changes to reduce the transmission of COVID-19 based on the investigation and review. In buildings or structures with mechanical ventilation, the SMCCCD 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, the SMCCCD shall use filters with the highest compatible filtering efficiency. SMCCCDs shall also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units or other air cleaning/ventilation systems would reduce the risk of transmission and, if so, shall implement their use to the degree feasible.

## **Standard Operating Procedure (SOP): Major COVID-19 Outbreaks**

### Scope

This SOP applies if 20 or more employee COVID-19 cases in an exposed group visited the workplace during their high-risk exposure period within a 30-day period, and shall apply until there are fewer than three COVID-19 cases detected in the exposed group for a 14-day period.

### Procedure

1. The SMCCCD shall provide a respirator for voluntary use to employees in the exposed group and shall determine the need for a respiratory protection program or changes to an existing respiratory protection program.
2. The SMCCCD shall implement applicable changes to reduce the transmission of COVID-19 based on the investigation and review.
3. The SMCCCD shall evaluate whether to halt some or all operations at the workplace until COVID-19 hazards have been corrected.