CITY AND COUNTY OF SAN FRANCISCO OFFICE OF THE CITY ADMINISTRATOR

COVID-19 Prevention Program

SUMMARY:

This COVID-19 Prevention Program includes policies, procedures, and practices to reduce the risk of workplace transmission of COVID-19 within the Office of the City Administrator. This is accomplished through a comprehensive program that includes hazard communication and identification, COVID-19 case and exposure reporting, COVID-19 case investigation, risk reduction control measures, and employee training.

AUTHORITY:

California Code of Regulations (CCR), Title 8, General Industry Safety Order, Section 3205; 3205.1; 3205.2; 3205.3; and 3205.4

SCOPE:

This document serves as the Office of the City Administrator written COVID-19 Prevention Program (CPP) and covers Departments and Programs under the Office of the City Administrator. The CPP applies to Office of the City Administrator employees except those who do not fall under the requirements as indicated in Title 8 California Code of Regulations (T8CCR), Section 3205, COVID-19 Prevention, which includes employees who are working from home or who are already covered by T8CCR 5199, The Aerosol Transmissible Diseases Standard. A copy of this CPP is available on the EHS Intranet site http://gsa.sfgov.org/wordpress/hr/health-and-safety/ and the Office of the City Administrator SharePoint site https://sfgov1.sharepoint.com/sites/ADM-CityAdminHR-HeathandSafety

IMPLEMENTATION:

Office of the City Administrator shall fully implement this program. The target date for implementation of this program is January 4, 2021.

Approved By: Kenneth a. Bukowski

Kenneth A. Bukowski Acting City Administrator City and County of San Francisco

Date Issued: 01/04/2021

CITY AND COUNTY OF SAN FRANCISCO OFFICE OF THE CITY ADMINISTRATOR

COVID-19 Prevention Program

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CITY AND COUNTY OF SAN FRANCISCO OFFICE OF THE CITY ADMINISTRATOR

COVID-19 Prevention Program

1.0 POLICY

The operations conducted by the City and County of San Francisco Office of the City Administrator encompass a variety of Departments and Programs with activities that present varying workplace COVID-19 exposure hazards to employees. It is our goal to protect the health and safety of our employees by putting into place policies, procedures, and practices to minimize these exposures. Each department and program within the Office of the City Administrator will conduct its operations and maintain its facilities and equipment in compliance with this COVID-19 Prevention Program (CPP). Employees who fall under the scope of this program are expected to implement the requirements and procedures within their area of responsibility as outlined in this program.

2.0 RESPONSIBILTIES

The City Administrator has overall responsibility for this program.

Department/Program Directors

- Ensure the CPP is fully implemented within their Department or Program area.
- Assign a COVID-19 Site Coordinator for each facility under their direction.
- Review any Hazard Identification and Control Measures Surveys for their facilities.
- Monitor COVID-19 cases within the organization.
- Support budget for program compliance.

Managers

- Ensure the requirements of this COVID-19 Prevention Program are in place and enforced within their facilities.
- Verify that COVID-19 hazards within their facilities are corrected to the extent feasible.
- Review any Hazard Identification and Control Measures Surveys conducted within their facilities.
- Review COVID-19 case investigation reports for workplaces under their authority.
- Budget for any resources needed to support the CPP in their facilities.

COVID-19 Site Coordinators

- Act as their facility point of contact for coordination of activities and the distribution of
 information related to COVID-19 within their workplace. This includes providing
 workplace notifications as directed by Directors, Managers, Human Resources and
 Environmental Health and Safety (EHS).
- Conduct the Hazard Identification and Control Measures Survey for their facility and ensure COVID-19 hazards are corrected in a timely manner. Report survey findings and the timetable for correction to the workplace Manager and Department/Program Director. Provide copies to the Safety Record Keeper or maintain on site.
- Arrange for enhanced cleaning and disinfection of the workplace as directed by Directors, Managers or EHS.

- Ensure COVID-19 case investigations are conducted by Supervisors as part of the Supervisor's Report of Incident Investigation.
- Verify that the facility screening procedures are implemented.

Supervisors

- Ensure employees under their direct supervision attend COVID-19 training and that training includes specific worksite safety rules and procedures to prevent the spread of COVID-19.
- Ensure employees comply with rules and safe work practices to prevent the spread of COVID-19 in the workplace.
- Notify the Manager, COVID-19 Site Coordinator, and EHS immediately when an employee reports a positive COVID-19 test or a close contact COVID-19 exposure.
- Conduct an investigation of workplace conditions to determine the possible cause(s) of COVID-19 cases occurring in the workplace and implement corrective actions. Share findings with the Site COVID-19 Coordinator and EHS.
- Participate in any contact tracing investigation assessments conducted by EHS.
- Complete required documentation and forms for COVID-19 cases and as directed by EHS, Human Resources or your Manager.
- Provide employees who are COVID-19 cases or who are close contact COVID-19 exposures with required documents and information as directed by EHS, Human Resources or your Manager.
- Ensure employees follow the workplace screening procedure and that they have access to clean face coverings, handwashing facilities (or hand sanitizer when handwashing facilities are not feasible), and personal protective equipment (PPE) when required by their job assignment.

Employees

- Know and follow safety rules and procedures to prevent the spread of COVID-19 as they apply to your specific workplace, job tasks, interactions with other people, and use of tools and equipment.
- Attend mandatory COVID-19 trainings.
- Follow screening procedures at your workplace.
- Do not come into work if you are sick with any symptoms associated with COVID-19; if you have received a positive COVID-19 test; or if you have had a COVID-19 exposure where you were within six feet of a COVID-19 case, for a total of 15 minutes or greater (in a 24-hour period) during that period of time when such an exposure is considered "high risk".
- Notify your supervisor immediately if you receive a positive COVID-19 test or if you
 have been a close contact of someone who is sick with COVID-19 or has had a positive
 test.
- Participate in any contact tracing assessments or investigations conducted by EHS, your Supervisor, or the Department of Public Health (DPH).
- If you have been told not to come into work due to a COVID-19 positive test or exposure, follow the guidance provided to you until the return to work criteria is met.

- Report any COVID-19 hazards in your workplace to your Supervisor.
- Encourage other employees to follow COVID-19 prevention work practices.

Safety Record Keepers

• Maintain records of employee training and the Hazard Identification and Control Measures Survey. These records will be maintained for three years.

Human Resources (HR)

- Provides information to employees on benefits they may be entitled to under T8 CCR 3205.
- Manages the reasonable accommodation process for employees who report conditions putting them at increased risk of severe COVID-19 illness.

Environmental Health and Safety (EHS)

- Provides guidance and technical assistance to Office of the City Administrator departments and programs to enable them to implement their site specific CCP requirements.
- Initiates a Contact Assessment Investigation when notified of a workplace COVID-19 case.
- Maintains a log of COVID-19 cases and close contacts and reports this information to Office of the City Administrator management, as directed.
- Reports cases to the Department of Human Resources (DHR), HR and DPH as needed by internal policies or regulatory requirements.
- Communicates with DPH, DHR, Supervisors and Managers as outlined in this program.

3.0 COMMUNICATION SYSTEMS

Communication between employees and Office of the City Administrator on matters related to COVID-19 is essential to preventing the spread of this virus. Our goal is to have effective two-way communication with our employees, in a form that is readily available and clear, and which includes the following:

- We ask employees to report, without fear of discrimination or retaliation, any symptoms, potential exposures, and possible hazards related to COVID-19 in the workplace. Employees are instructed to make these reports to their immediate manager or supervisor.
- Our procedures for employees to engage in the reasonable accommodation process if they
 report medical or other conditions that put them at increased risk of severe COVID-19
 illness.
- If an employee is suspected of having a workplace exposure to COVID-19, we provide information about access to COVID-19 testing at no cost to the employee. We will inform affected employees of the reason for testing and what happens after a positive test or a close contact exposure. Employees are eligible for testing through CityTestSF. (https://sf.gov/find-out-about-your-covid-19-testing-options).
- In the event we are required to provide testing, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the

possible consequences of a positive test.

• We communicate information about COVID-19 hazards and our COVID-19 policies and procedures to employees and other employers, persons, and entities within or in contact with our workplace. Where we may have employees working at locations controlled by other employers, our employees will follow whichever employer's program is stricter and stay informed of site-specific prevention measures. The requirements of our plan must be followed by any other employer's employees entering our workplace.

4.0 IDENTIFICATION AND EVALUATION OF COVID-19 HAZARDS

We evaluate our workplace and operations to identify activities that may contribute to an exposure to COVID-19. These surveys include interactions, areas, activities, processes, equipment, and materials that could present potential exposure to COVID-19. Employees and their authorized representatives are encouraged to participate and to share information on potential COVID-19 hazards.

- Surveys will be documented and include the following:
 - o Identification of places and times when people may gather or come in contact with each other. Examples of where to evaluate: entrances and exits, registration and help desks, meeting rooms, bathrooms, hallways, aisles, stairways, elevators, break or eating areas, waiting rooms, and vehicles.
 - o Employees' potential workplace exposure to persons in the workplace, including coworkers, customers/clients, contractors, vendors, and members of the public.
 - A review of COVID-19 prevention control measures and whether different or additional controls are needed. Examples of COVID-19 control measures include, but are not limited to: Posting informational signs, requiring face coverings, installing barriers between people, physical distancing, marking the floor to indicate where people should stand, having hand sanitizer stations, limiting occupancy, telework policies, staggering shifts and breaks, and frequent cleaning of high touch surfaces.
 - For indoor locations, we will consider how to maximize the quantity of outdoor air and whether it is feasible to increase filtration efficiency with an existing ventilation system.
- Surveys will be conducted at the beginning of this program and periodically as needed to check that the controls are effective, to identify unhealthy work conditions or practices, and to ensure compliance with this plan.
- Each facility within the Office of the City Administrator has a procedure for screening employees for, and responding to, employees with COVID-19 symptoms in their workplace. Screening is either conducted in person, or through an on-line "check your health" tool that can be found at https://sf.gov/check-your-health-city-staff. In person temperature monitoring, is generally limited to facilities with field staff, including Public Works (PW) Operations (2323 Cesar Chavez), Department of Telecommunications (200 Paul) and custodial staff working at various locations for the Real Estate Division (RED). The list of facilities and employees who follow in person

temperature monitoring screening procedures is subject to change based on the needs of the facility.

- Employees who have symptoms of COVID-19, have been a close contact of a COVID-19 case, or who have received a positive COVID-19 test, must report this information immediately and directly to their supervisor or manager as soon as this information is known and must not come into the workplace.
- Additionally, the Office of the City Administrator will continue to review applicable orders and guidance from the State of California, Cal/OSHA, and the San Francisco Department of Public Health related to COVID-19 hazards and prevention.

5.0 CORRECTION OF COVID-19 HAZARDS

To prevent the spread of COVID-19 in the workplace, we consider all persons, regardless of symptoms or testing, as potentially infectious. We will use feasible control measures to minimize or eliminate our employees' exposure to COVID-19 and will correct unsafe conditions, work practices, policies and procedures in a timely manner based on the severity of the hazard.

6.0 MEASURES TO PREVENT COVID-19 EXPOSURES

Office of the City Administrator Departments/Programs will continue to adhere to applicable SFDPH Health Orders, Directives and Protocols. In compliance with this standard, we will ensure the following prevention measures are in place at each workplace:

- **6.1 Physical Distancing:** Where possible, we will ensure that there is at least six feet of physical distancing at all time in our workplace except where we can show that it is not possible or for only brief times during the movement of people in the workplace. When six feet cannot be maintained, people will be as far apart as possible. Methods we will use for physical distancing include:
 - Implementing telecommuting policies and procedures to promote telework for those employees who do not need to come into the workplace.
 - Moving activities outdoors, if possible.
 - Reducing the number of persons in an area at one time (including visitors)
 - Staggered arrival, departure, work, and break times.
 - Using visual cues, such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- **6.2 Wearing a Face Covering:** We require that employees comply with SFDPH Health Orders and guidance from the California Department of Public Health (CDPH) that mandate workers wear face coverings. We will:
 - Require that employees wear a face covering when indoors, including vehicles (see exception below). Face coverings must be worn outdoors if employees are within 6 feet of any other person for any amount of time.
 - Provide face coverings to employees and ensure they are worn properly over the nose and mouth. Where employees want to wear their own face covering, they are allowed to do so as long as they meet face covering requirements outlined in this plan, in SFDPH and CDPH Health Orders, and with any specific workplace requirements where

- the employee is assigned to work. For example, a healthcare facility may provide and require wearing of a disposable face covering. Use of personal face coverings may be subject to change and are based on current Health Orders, hazard identification and City policies.
- Ensure face coverings used by employees do not have a one-way valve that is designed to allow the release of exhaled air from inside the mask. In addition, they must be made of a cloth or woven material, fit snuggly, cover the nose and mouth completely, and be clean and undamaged.
- Post signs at the entrance to the workplace to communicate the requirement for face coverings by any non-employees entering the workplace. We provide face coverings to members of the public, if necessary.
- Instruct employees to maintain physical distancing when working with members of the public who are not wearing face coverings or who are not wearing the face covering over their nose and mouth completely.
- Employees are not required to wear a face covering in the following situations:
 - When alone in a room, with the door closed, and no other persons will foreseeably be entering the space (e.g., a private office).
 - While eating or drinking at the workplace, provided employees are at least six feet apart and the outside air supply to the area, if indoors, has been maximized to the extent possible.
 - o In a personal vehicle or vehicle assigned to the exclusive use of an employee and there are no passengers.
 - When wearing respiratory protection in accordance with T8 CCR Section 5144 or other Title 8 Safety Orders.
 - When employees are not able to wear a face covering due to a medical or mental health condition or disability. In this case, alternatives will be considered on a caseby-case basis as a reasonable accommodation by Human Resources.
 - A task that cannot feasibly be performed with a face covering. In this exception, the task will be evaluated prior to any activity and is limited to the time period in which such tasks are being performed; the unmasked employee must still remain at least six feet away from other persons unless the unmasked employee is tested at least twice weekly for COVID-19.
- **6.3 Engineering Controls:** We implement the following measures for situations where we cannot maintain at least six feet between individuals:
 - Maximize outdoor air for ventilation as much as feasible except when the EPA's Air Quality Index is greater than 100, or when increasing outdoor air would cause harm to employees, such as excessive heat or cold.
 - Evaluate our facilities to increase filtration efficiency to the extend feasible so it is still compatible with the function of our ventilation system.
 - Installing cleanable, solid partitions between coworkers or between workers and customers when 6 feet of distance cannot be maintained.
- **6.4 Cleaning and Disinfecting:** At each of our facilities, we implement cleaning and disinfection measures for surfaces and especially frequently touched surfaces. We use

products that meet the EPA's criteria for use against coronavirus; use is according to manufacturer's directions. Our facilities follow guidance from SFDPH. Should we have a COVID-19 case in our workplace, site specific procedures will be followed.

- **6.5 Shared tools, equipment, and personal protective equipment (PPE):** PPE must not be shared without supervisor approval and must have procedures in place to clean and disinfect PPE between users.
 - 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.
 - 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.

6.6 Hand sanitizing: In order to implement effective hand sanitizing procedures, we:

- Evaluate handwashing facilities and determining the need for additional facilities.
- Encourage and allow 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.

6.7 Personal protective equipment (PPE) 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.
- We provide and ensure use of eye protection and respiratory protection in accordance with T8 Section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

In addition to the prevention measures above, each facility will determine what, if any, additional prevention control measures will be implemented to minimize potential exposures identified by the Workplace COVID-19 Hazard Identification evaluation.

7.0 INVESTIGATION AND RESPONSE TO COVID-19 CASES

Employees must immediately report a positive COVID-19 test result or if they have had a close contact exposure to a COVID-19 case to their Supervisor. These employees should remain home and not come into the workplace. Upon receiving notification from an employee of a positive COVID-19 test or exposure, the following will occur:

- The employee will be instructed by their Supervisor to remain at home to either Home Ouarantine or Home Isolate.
- The Supervisor will provide the employee with the following documents:

- DHR Return to Work Guidance (https://sfdhr.org/sites/default/files/documents/COVID-19/Requirements-for-Employees-Returning-to-Work.pdf)
- SF DPH Guidelines for Home Isolation and Quarantine
 (https://www.sfdph.org/dph/alerts/covid-guidance/Guidance-Isolation-and-Quarantine.pdf)
- <u>DHR COVID-19 Leave Request Form</u>
 (https://sfdhr.org/sites/default/files/documents/COVID-19/COVID-19-Sick-FMLA-Vac-Request-Form.pdf)
- Nurse COVID-19 Triage Advice Phone Line for any health questions about COVID-19. (https://sfdhr.org/sites/default/files/documents/COVID-19/nurse-triage-reporting-hotline.pdf). This advice phone line is available 24/7.
- O Get TestedSF flyer (for employees who have had a close contact or who have symptoms and have not yet been tested). (https://www.sfcdcp.org/wp-content/uploads/2020/04/GetTestedSF-Eng-052920.pdf). This document provides information to employees about how to obtain COVID-19 testing, at no cost, at a city testing location.
- Workers' Compensation Claim Form (DWC-1) (http://gsa.sfgov.org/wordpress/hr/wpcontent/uploads/sites/10/2020/01/2DWCForm1.pdf). This form is provided to employees who have received a positive COVID-19 test. The employee has the right to file for a workers' compensation claim if they believe their infection was a result of a workplace exposure.
- The supervisor will immediately notify EHS of the COVID-19 case or close contact and provide EHS with the employee's contact information.
- EHS will initiate a Contact Assessment Investigation with the employee and Supervisor to determine if the employee was at the workplace during a high-risk exposure period and if there were any workplace close contact COVID-19 exposures. The employee interview will include an evaluation of activities and locations visited by the COVID-19 case during the high-risk period. The COVID-19 case will be reminded by EHS of the requirements for isolation and return to work requirements.
- If close contact was identified, EHS will notify the supervisor and contact the employee to inform them that they have had a close contact COVID-19 exposure. This notification will occur within one business day. The employee will also be informed of how to obtain a COVID-19 test and of DHR policies for quarantining and returning to work.
- EHS will request that the Supervisor investigate COVID-19 hazards that may have resulted in a workplace COVID-19 case or exposure. The supervisor will document this information and any other facts on the COVID-19 Supervisor's Report of Incident Investigation. (For example, if there was lack of physical distancing that resulted in a close contact COVID-19 exposure, why did this occur? What additional control

measures need to be in place?). The Supervisor will send the completed report with their findings to EHS and the Safety Record Keeper.

- EHS will inform the COVID-19 Site Coordinator to send out a general exposure advisory that notifies others in the workplace that someone has tested positive for COVID-19 (see the COVID-19 General Exposure Advisory for Adults) (https://www.sfdph.org/dph/files/ig/COVID19-Exposure-GenAdvisory.pdf)
- The COVID-19 Site Coordinator will ensure that site specific enhanced cleaning protocols are implemented in the exposed workplace.

8.0 TRAINING AND INSTRUCTION

Employees will be provided with training and instruction on the symptoms of COVID-19 illness and exposure control methods in place at their workplace including:

- Information on how COVID-19 spreads and infects people (i.e., 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).
- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- COVID-19 symptoms, the importance of obtaining a COVID-19 test, how to obtain a test, and that they should not come to work if experiencing any COVID-19 symptoms.
- The symptom screening procedures for employees and any visitors at their workplace.
- Risk of exposure to COVID-19 on the job.
- Cleaning and disinfection schedules and procedures at their workplace.
- Control measures to protect employees from exposure and infection:
 - o Requiring employees to stay home when sick.
 - Physical distancing. Employees must maintain at least 6' of separation from other individuals in the workplace. Since infectious aerosols can travel further than 6', face coverings are required along with physical distancing at our workplaces.
 - Frequent handwashing with soap and water for at least 20 seconds or using hand sanitizer when handwashing sinks are not readily accessible.
 - 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.
 - Covering coughs and sneezes.
- What personal protective equipment (PPE) is required for an employee's assigned work tasks to protect them from COVID-19 exposure.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- This training will be documented, and a copy of the roster will be provided to the Safety Record Keeper.

9.0 EXCLUSION FROM THE WORKPLACE

The purpose of this section is to limit the spread of COVID-19 in the workplace. We will do this as follows:

- Ensuring that COVID-19 cases are excluded from the workplace until our return-towork requirements are met.
- Excluding employees with reported COVID-19 exposure from the workplace after the last known COVID-19 exposure to a COVID-19 case. The period of exclusion will be based on the most current local and state health authority guidelines.
- Continuing and maintaining an employee's earnings, seniority and other rights and benefits when we have determined that the COVID-19 exposure is work related. Information will be provided to employees about their benefits (i.e., Sick Leave, Emergency FMLA, or other leave options) at the time of exclusion. These rights and benefits can also be viewed on the Department of Human Resources COVID-19 website. (https://sfdhr.org/covid-19).

10.0 RETURN TO WORK CRITERIA

Our criteria for employees to return to work are provided below and may be subject to change as information is updated from local and state health authorities:

- COVID-19 cases with COVID-19 symptoms will not return to work until 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, **AND**,
 - o COVID-19 symptoms have improved, AND,
 - o 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.
- 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 10 days from the time the order to quarantine was effective.
- A negative COVID-19 test will not be required for an employee to return to work.
- Employees that have approval from Cal/OSHA, on the basis that removal from the workplace would create an undue risk to the community's health and safety, and where they do not violate local or state health orders, may be allowed to return to the workplace with special conditions met to prevent transmission. In these exceptional cases, specific procedures will be developed to ensure control measures are in place, which may include, but is not limited to, isolation of the employee and use of respiratory protection.

11.0 REPORTING, RECORDKEEPING AND ACCESS

11.1 Reporting: We will report the following:

- To the San Francisco Department of Public Health (SFDPH) we will report information about COVID-19 cases at our workplace and provide any requested information. We will also notify SFDPH, immediately, but no later than 48 hours of knowledge, of three or more COVID-19 cases within the workplace.
- To our Workers' Compensation Claims Administrator, we will report when an employee has tested positive for COVID-19. This report will be made within three days of knowledge of an employees' positive test result.
- To Cal/OSHA, we will report any COVID-19-related serious injury or illness, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment. This would include a COVID-19 illness that required inpatient hospitalization or resulted in death. This report will be made as soon as possible, but in no case more than eight hours after knowledge.
- On our Cal/OSHA Log of Work-Related Injuries and Illness (Form 300), we will record work-related COVID-19 cases that meet one of the following criteria: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, loss of consciousness, significant injury or illness diagnoses by a physician or other licensed health care professional.
- **11.2 Recordkeeping and Access:** We will maintain records of steps taken to implement this program, including records of hazard identification surveys, investigations, and training. In addition, we will:
 - Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA, upon request.
 - Keep a record of and track COVID-19 cases in a manner that captures the name of the employee, contact information, occupation (job classification and title), work location, date of last day at the workplace, and the date of a positive COVID-19 test. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed in order to keep medical information confidential.