

COVID-19 Prevention Program (CPP)

December 1, 2020: *This CPP is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace and the client workplaces of our temporary workers. This CPP was established and implemented as an effective written COVID-19 prevention program Temporary Standard per California Code of Regulations (Title 8, section 3205 c) November 2020.*

Authority and Responsibility

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

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

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the **Appendix B: COVID-19 Inspections form** as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.
- Prior to authorizing an employee to work on a client job site (non-remote position), SDI Staffing will complete a client evaluation on the client's CPP plan, Covid safety guidelines, and prevention & training practices by having clients with in-office temporary employees to complete our Covid-19 Joint Employer Safety Management questionnaire online at <https://www.sdistaffing.com/covid-19-joint-employer-safety-management/>.

Employee Participation

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

- (1) wearing proper Personal Protective Equipment (PPE);
- (2) maintaining at least 6' social distancing;
- (3) washing hands often and disinfecting personal workstation;
- (4) completing the daily Employee Health Questionnaire;
- (5) immediately reporting to management when you have been exposed to the virus; and
- (6) reporting all exposure hazards, potential exposure hazards or hearsay about potential exposure hazards either in SDI Staffing's office or client specific sites immediately to the SDI Staffing's Vice President of Staffing Operations and work together with coworkers, temporary associates, clients and management to improve and maintain worksite Covid safety.

Employee Screening

We screen our employees by having them self-screen according to CDPH guidelines and requiring employees to complete a daily Employee Health Questionnaire online at <https://www.sdistaffing.com/employee-health-questionnaire/>. Employees working at client job sites will be required to follow the Covid safety guidelines set by each client that is compliant with ATD Standard

Control of COVID-19 Hazards

Physical Distancing

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

- Eliminating the need for workers to be in the workplace – e.g., telework or other remote work arrangements.
- Reducing the number of persons in an area at one time, including visitors.
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Staggered arrival, departure, work, and/or break times.
- Adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.
- SDI Staffing office entrance remains locked, controlling the number of visitors permitted in the office.
- Ensuring our clients also apply 6 feet distance at job sites where our employees are working. Any exception should be reported to and approved by SDI Staffing's Vice President of Staffing Operations.

Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

Face Coverings

When not working remotely, we provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department. Employees, however, may choose to wear their own personal face coverings. Any employees that encounter another employee or a non-employee on-site not wearing a face covering should keep their distance and immediately report that person to his/her supervisor.

The following are exceptions to the use of face coverings in our workplace:

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.

Engineering Controls (SDI Staffing office)

SDI Staffing maximizes, to the extent feasible, the quantity of outside air for our office with mechanical or natural ventilation systems and will implement the following measures for situations where we cannot maintain at least six feet distance between individuals:

- Leaving the air condition or furnace fan in the ON position and opening windows and doors where possible, unless heat and/or wildfire smoke will not allow this, in which case most, if not all staff, may be sent home to work.
- Limiting the number of in-office visitors.

SDI Staffing does not own our office building and, thus, cannot install any special ventilation or filtration systems to mitigate air-borne illness. Unless there is some unforeseen emergency, there should be no reason not to maintain 6-foot distancing.

Cleaning and Disinfecting

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

- Clean and sanitize your personal workstation daily.
- Clean and sanitize any common areas and/or equipment (i.e. kitchen, bathroom, coffee maker, microwave, etc.) after each use by wiping down surfaces.
- Wash hands with warm water and soap frequently for at least 20 seconds and avoid touching your eyes, nose, and mouth. This is to be done upon arriving at work, after using the bathroom, after blowing your nose/coughing/sneezing, and before eating.
- Increase in the cleaning of common areas by janitorial staff to include a “confirmation of cleaning” list.

Should we have a COVID-19 case in our workplace, we will implement the following procedures:

Designated and trained personnel will clean and disinfect areas, materials and equipment used by the employee testing positive for COVID-19.

Client Offices: To the best of our abilities, SDI Staffing will verify that clients also follow satisfactory cleaning and disinfecting measures in order to keep our temporary employees safe.

Shared tools, equipment and personal protective equipment (PPE)

PPE must not be shared, e.g., gloves, goggles and face shields.

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by using cleaning disinfectants.

SDI Staffing will verify that clients either clean and disinfect tools and equipment or provide employees with materials and training to do it themselves.

Hand Sanitizing

In order to implement effective hand sanitizing procedures, we:

- Evaluate handwashing facilities.
- Determine the need for additional facilities.
- Encourage and allow time for employee handwashing.
- Provide employees with effective hand sanitizers and hand washing soap.
- Encourage employees to wash their hands for at least 20 seconds each time in warm water.

Investigating and Responding to COVID-19 Cases

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

Employees who had potential COVID-19 exposure in our workplace will be offered information on COVID-19 testing, and allowed to get tested, with pay and at no cost, during their working hours.

The information on benefits described in the Training and Instruction, and Exclusion of COVID-19 Cases, below will be provided to them.

System for Communicating

Our goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and that it includes the following information:

- **Employees should report COVID-19 symptoms and possible hazards at their job or worksite by:**
Phone/Text: 888-528-8367
Email: michelle@sdistaffing.com or julie@sdistaffing.com
- Employees can report symptoms and hazards without fear of reprisal.
- Our procedures and policies will accommodate employees with medical and/or other conditions that put them at increased risk of severe COVID-19 illness.
- Where testing is not required, employees can access COVID-19 testing at their doctor's office or the closest free testing location that can be found online at <https://covid19.ca.gov/get-tested/>.
- In the event we are required to provide COVID-19 testing because of a workplace exposure or outbreak, 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 in response to CCR Title 8 section 3205.1, Multiple COVID-19 Infections and COVID-19 Outbreaks, as well as section 3205.2, Major COVID-19 Outbreaks.
- Information about COVID-19 hazards 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.
- All temporary employees assigned to client job sites should be trained and this training should be documented. Employees should notify SDI Staffing's Vice President of Staffing Operations immediately by phone/text at 888-528-8367 or email michelle@sdistaffing.com if they are not informed and trained about COVID-19 hazards and controls before beginning their assigned duties.

If Exposed or Contract COVID-19

Inform SDI Staffing and your direct supervisor on the job immediately of any symptoms or possible exposure.

If you may have been exposed but have NO symptoms:

- You may choose to self-quarantine, work remotely upon approval, or use any available sick leave, PTO, vacation or unpaid time off.
- You may choose to be tested and remain off work until you receive a negative result.

If you DO have symptoms:

- You will be required to provide certification to determine eligibility for up to 2 weeks of emergency Paid Sick Leave through the Federal Families First (CARES Act).
- You must remain off work for a minimum of 2 weeks, without symptoms for at least 3 days, or with proof of a negative test result.

Training and Instruction

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
 - COVID-19 is an infectious disease that can be spread through the air.
 - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
 - An infectious person may have no symptoms.

- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of facecoverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

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

Exclusion of COVID-19 Cases

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished by employer-provided sick leave benefits, payments from public sources or other means of maintaining earnings, rights and benefits where permitted by law and when not covered by workers' compensation.
- Providing employees at the time of exclusion with information on available benefits.

Reporting, Recordkeeping, and Access

It is our policy to:

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

Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
 - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
 - COVID-19 symptoms have improved.
 - At least 14 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 14 days have passed since the date of specimen collection of their first positive COVID-19 test.
- A negative COVID-19 test will not be required for an employee to return to work.
- If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will

not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.

NOTICE REGARDING SAFETY AND TRAINING OF TEMPORARY EMPLOYEES WORKING ON SITE AT CLIENT FACILITIES

We make every effort to ensure our clients comply with safety compliance, training requirements, and other directives affecting temporary employees in the same manner as their own employees and visitors onsite. Since SDI Staffing does not have direct day-to-day control over its temporary employees or the job site, we make every effort to ensure the safety of our temporary employees by:

- (1) Obtaining signed client agreements for temporary staffing services that specify the client's responsibility for the safety procedures, orientation and equipment of temporary employees assigned to their offices;
- (2) Completing a client evaluation on the client's CPP plan, Covid Safety Guidelines and Prevention & Training Practices to determine whether the client job site is a safe place to have our temporary employees working. This is done by verbally discussing the CPP Plan, Covid Safety Guidelines, and Prevention & Training Practices with an authorized client contact verbally and then requesting a client authorized representative complete our Covid-19 Joint Employer Safety Management questionnaire in writing. (The safety questionnaire is located online at <https://www.sdistaffing.com/covid-19-joint-employer-safety-management/>); and
- (3) Instructing all employees to immediately report any safety concerns to SDI Staffing, ensuring concerns and reports will be taken seriously and corrective measures will be taken to continue a safe space to work.



12/22/2020

Michelle Moriarty, Vice President of Staffing Operations

Appendix A: Identification of COVID-19 Hazards

All persons, regardless of symptoms or negative COVID-19 test results, will be considered potentially infectious. Particular attention will be paid to areas where people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not. For example: meetings, entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

Evaluation of potential workplace exposure will be to all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

Person conducting the evaluation: _____

Date: _____

Name(s) of employee and authorized employee representative that participated:

Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards	Places and times	Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers	Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation

Appendix B: COVID-19 Inspections

Date: _____

Name of person conducting the inspection: _____

Work location evaluated: _____

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Administrative			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers & supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			

Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 testing or related medical services provided by us will be provided in a manner that ensures the confidentiality of employees, with the exception of unredacted information on COVID-19 cases that will be provided immediately upon request to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law.

All employees’ medical records will also be kept confidential and not disclosed or reported without the employee’s express written consent to any person within or outside the workplace, with the following exceptions: (1) Unredacted medical records provided to the local health department, CDPH, Cal/OSHA, NIOSH, or as otherwise required by law immediately upon request; and (2) Records that do not contain individually identifiable medical information or from which individually identifiable medical information has been removed.

Date: _____

Name of person conducting the inspection: _____

Employee (or non-employee*) name:		Occupation (if non-employee, why they were in the workplace):	
Location where employee worked (or non-employee was present in the workplace):		Date investigation was initiated:	
Was COVID-19 test offered?		Name(s) of staff involved in the investigation:	
Date and time the COVID-19 case was last present in the workplace:		Date of the positive or negative test and/or diagnosis:	
Date the case first had one or more COVID-19 symptoms:		Information received regarding COVID-19 test results and onset of symptoms (attach documentation):	

<p>Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):</p>	
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<p>Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:</p>		
<p>All employees who may have had COVID-19 exposure and their authorized representatives.</p>	<p style="text-align: center;">Date:</p>	
	<p style="text-align: center;">Names of employees that were notified:</p>	
<p>Independent contractors and other employers present at the workplace during the high-risk exposure period.</p>	<p style="text-align: center;">Date:</p>	
	<p style="text-align: center;">Names of individuals that were notified:</p>	

Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:			
What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?		What could be done to reduce exposure to COVID-19?	
Was local health department notified?		Date:	

*Should an employer be made aware of a non-employee infection source COVID-19 status.

