

Northwestern

California COVID-19 Prevention
Procedures (CPP)

Environmental Health and Safety

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I. Purpose

This CPP is designed to control employees' exposures to the SARS-CoV-2 virus (severe acute respiratory syndrome coronavirus 2) that causes COVID-19 (Coronavirus Disease 2019) that may occur in our workplace.

II. Scope

This CPP applies to Northwestern employees in the State of California.

III. Authority and Responsibility

The Director of Environmental Health and Safety (EHS) has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the procedures 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.

IV. Application of the Northwestern Injury & Illness Prevention Program (IIPP)

COVID-19 is a recognized hazard in our workplace that is addressed through our IIPP, which will be effectively implemented and maintained to ensure the following:

1. When determining measures to prevent COVID-19 transmission and identifying and correcting COVID-19 hazards in our workplace:
 - a. All persons in our workplace are treated as potentially infectious, regardless of symptoms, vaccination status, or negative COVID-19 test results.
 - b. COVID-19 is treated as an airborne infectious disease. Applicable State of California and San Francisco Department of Public Health (SFDPH) orders and guidance will be reviewed when determining measures to prevent transmission and identifying and correcting COVID-19 hazards. COVID-19 prevention controls include:
 - i. Remote work.
 - ii. Physical distancing.
 - iii. Reducing population density indoors.
 - iv. Moving indoor tasks outside.
 - v. Implementing separate shifts and/or break times.
 - vi. Restricting access to work areas.
2. [Training and instruction](#) on COVID-19 prevention is provided:
 - a. When this CPP was first established.
 - b. To new employees.
 - c. To employees given a new job assignment involving COVID-19 hazards and they have not been previously trained.
 - d. Whenever new COVID-19 hazards are introduced.

- e. When we are made aware of new or previously unrecognized COVID-19 hazards.
- f. For supervisors to familiarize themselves with the COVID-19 hazards to which employees under their immediate direction and control may be exposed.

Northwestern's myHR system will be used to document this training.

- 3. Procedures to investigate COVID-19 illnesses at the workplace include:
 - a. Determining the day and time a COVID-19 case was last present; the date of the positive COVID-19 tests or diagnosis; and the date the COVID-19 case first had one or more COVID-19 symptoms. A cloud-based application will be used to collect and document this information.
 - b. Effectively identifying and responding to persons with COVID-19 symptoms at the workplace by posting instructional signage at campus entrances encouraging all employees to:
 - i. Regularly monitor their personal health status,
 - ii. Wear face coverings and obtain a test if they have COVID-19 symptoms,
 - iii. Report COVID-19 symptoms and to stay home when ill.
- 4. Effective procedures for responding to COVID-19 cases at the workplace include:
 - a. Immediately excluding COVID-19 cases (including employees excluded under CCR, Title 8, section 3205.1) according to the following requirements:
 - i. COVID-19 cases who do not develop COVID-19 symptoms will not return to work during the infectious period.
 - ii. COVID-19 cases who develop COVID-19 symptoms will not return to work during the shorter of either of the following:
 - 1. The infectious period.
 - 2. Through 10 days after the onset of symptoms and at least 24 hours have passed since a fever of 100.4 degrees Fahrenheit or higher has resolved without the use of fever-reducing medication.
 - iii. Regardless of vaccination status, previous infection, or lack of COVID-19 symptoms, a COVID-19 case must wear a face covering in the workplace until 10 days have passed since the date that COVID-19 symptoms began or, if the person did not have COVID-19 symptoms, from the date of their first positive COVID-19 test.
 - iv. Elements i. and ii. apply regardless of whether an employee has been previously excluded or other precautions were taken in response to an employee's close contact or membership in an exposed group.
 - b. Reviewing current [California Department of Public Health \(CDPH\)](#) guidance for persons who had close contacts, including any guidance regarding quarantine or other measures to reduce transmission.
 - c. The following effective policies will be developed, implemented, and maintained to prevent transmission of COVID-19 by persons who had close contacts.
 - i. Notification within 1 business day upon being identified as a close contact, by the site manager or designee.

- ii. Individuals are expected to take [additional safety precautions](#) if they are in non-incident direct contact with individuals who test positive for COVID-19 for 10 days after their last exposure.
 - iii. Provide testing and encourage employees to test immediately and again 5 full days after last known exposure.
 - iv. Encourage individuals to wear a well-fitting face covering and monitor their health for COVID-19 symptoms for 10 days after their last exposure.
- d. If an order to isolate, quarantine, or exclude 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.
- e. If removal of an employee would create undue risk to a community's health, Northwestern may submit a request for a waiver to Cal/OSHA in writing to rs@dir.ca.gov to allow employees to return to work if it does not violate local or state health official orders for isolation, quarantine, or exclusion.
- f. Effective control measures that will be implemented and maintained to prevent transmission in the workplace, including providing isolation for the employee at the workplace and, if isolation is not feasible, the use of respirators in the workplace, will be determined and established on a case-by-case basis.
- g. Upon excluding an employee from the workplace based on COVID-19 or a close contact, Northwestern will provide excluded employees 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 leave, workers' compensation law, local governmental requirements, and Northwestern leave policies and leave guaranteed by contract. When employees are notified about the exclusion via email by the site manager or designee, they will be referred to information about Northwestern's applicable leave policies.

V. Testing of Close Contacts

COVID-19 tests are available at no cost, during paid time, to all of our employees who had a close contact in the workplace. These employees will be provided with the information outlined in paragraph (4)(f), above.

Exceptions are returned cases as defined in CCR, Title 8, section 3205(b)(11).

VI. Notice of COVID-19 Cases

Individuals who had a close contact, as well as any employer with an employee who had a close contact, will be notified as soon as possible, and in no case longer than the time required to ensure that the exclusion requirements of paragraph (4)(a) above, are met.

When Labor Code section 6409.6 or any successor law is in effect, Northwestern will:

1. Provide notice of a COVID-19 case, in a form readily understandable to employees. The notice will be given to all individuals at the worksite.
2. Provide the notice to the authorized representative, if any of:
 - a. The COVID-19 case and of any employee who had a close contact.

- b. All employees on the premises at the same worksite as the COVID-19 case within the infectious period.
3. Close contacts will be notified via email or phone by the site manager, or designee.

VII. Face Coverings

Employees will be provided face coverings and required to wear them when required by a CDPH regulation or order. This includes spaces within vehicles when a CDPH regulation or order requires face coverings indoors. Face coverings will be clean, undamaged, and worn over the nose and mouth.

The following exceptions apply:

1. When an employee is alone in a room or vehicle.
2. While eating or drinking at the workplace, provided employees are at least six feet apart and, if indoors, the supply of outside or filtered air has been maximized to the extent feasible.
3. While employees are wearing respirators required by the employer and used in compliance with CCR, Title 8 section 5144.
4. Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Such employees shall wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if the condition or disability permits it.
5. During 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.

If an employee is not wearing a face covering due to exceptions (4) and (5), above, the COVID-19 hazards will be assessed, and action taken as necessary.

Employees will not be prevented from wearing a face covering, including a respirator, when not required by this section, unless it creates a safety hazard.

VIII. Respirators

Respirators (i.e., N95s) will be provided for voluntary use to employees who request them and who are working indoors or in vehicles with more than one person. Employees who request respirators for voluntary use will be:

1. Required to complete and submit Northwestern's [Voluntary Use of a Filtering Facepiece Form](#).
2. Encouraged to use them.
3. Provided with a respirator of the correct size.
4. [Trained](#) on:
 - a. How to properly wear the respirator provided.
 - b. How to perform a user seal check according to the manufacturer's instructions each time a respirator is worn.
 - c. The fact that facial hair interferes with a seal.

The requirements of CCR, Title 8 section 5144(c)(2) will be complied with according to the type of respirator (disposable filtering face piece or elastomeric re-usable) provided to employees.

IX. Ventilation

For our indoor workplaces we will:

1. Review CDPH and Cal/OSHA guidance regarding ventilation, including the CDPH [Interim Guidance for Ventilation, Filtration, and Air Quality in Indoor Environments](#). Northwestern will develop, implement, and maintain effective methods to prevent transmission of COVID-19. In particular, in buildings and structures with mechanical ventilation, Northwestern will filter circulated air through filters at least as protective as Minimum Efficiency Reporting Value (MERV)-13, or the highest level of filtration efficiency compatible with the existing mechanical ventilation system.
2. Determine if our workplace is subject to CCR, Title 8 section 5142 Mechanically Driven Heating, Ventilating and Air Conditioning (HVAC) Systems to Provide Minimum Building Ventilation, or section 5143 General Requirements of Mechanical Ventilation Systems, and comply as required.

In vehicles, we will maximize the supply of outside air to the extent feasible, except when doing so would cause a hazard to employees or expose them to inclement weather.

X. Reporting and Recordkeeping

A cloud-based application will be used to keep a record of and track all COVID-19 cases. These records will be kept by the Director of Environmental Health and Safety and retained for two years beyond the period in which it is necessary to meet the requirements of CCR, Title 8, sections 3205, 3205.1, 3205.2, and 3205.3.

The notices required by subsection 3205(e) will be kept in accordance with Labor Code section 6409.6 or any successor law.

Chris Yohe
Director, Environmental Health and Safety



Dated: June 6, 2023

XI. Contact

For questions, contact Environmental Health and Safety at ehs@northwestern.edu.

Additional Consideration No. 1

COVID-19 Outbreaks

This addendum will be added to the CPP if three or more employee COVID-19 cases within an exposed group visited the workplace during their infectious period at any time during a 14-day period, unless a CDPH regulation or order defines outbreak using a different number of COVID-19 cases and/or a different time period. Reference CCR, Title 8 section 3205.1 for details.

This addendum will stay in effect until there are one or fewer new COVID-19 cases detected in the exposed group for a 14-day period.

COVID-19 Testing

We immediately provide COVID-19 testing available at no cost to our employees within the exposed group, regardless of vaccination status, during employees' paid time, except for returned cases and employees who were not present at the workplace during the relevant 14-day period(s).

Additional testing is made available on a weekly basis to all employees in the exposed group who remain at the workplace.

Employees who had close contacts will have a negative COVID-19 test taken within three to five days after the close contact or will be excluded and follow our return-to-work requirements starting from the date of the last known close contact.

Face Coverings

Employees in the exposed group, regardless of vaccination status, will wear face coverings when indoors, or when outdoors and less than six feet from another person, unless one of the exceptions in our CPP applies.

Respirators

Employees will be notified of their right to request and receive a respirator for voluntary use, as stipulated in our CPP.

COVID-19 Investigation, Review, and Hazard Correction

Northwestern will perform a review of potentially relevant COVID-19 policies, procedures and controls, and implement changes as needed to prevent further spread of COVID-19 when this addendum initially applies and periodically thereafter. The investigation, review, and changes will be documented and include:

1. Investigation of new or unabated COVID-19 hazards including:
 - a. Our leave policies and practices and whether employees are discouraged from remaining home when sick.
 - b. Our COVID-19 testing policies.
 - c. Insufficient supply of outdoor air to indoor workplaces.
 - d. Insufficient air filtration.
 - e. Insufficient physical distancing.
2. Review updated every 30 days that CCR, Title 8 section 3205.1 continues to apply:

- a. In response to new information or to new or previously unrecognized COVID-19 hazards.
 - b. When otherwise necessary.
3. Any changes implemented to reduce the transmission of COVID-19 based on the investigation and review, which may include:
 - a. Moving indoor tasks outdoors or having them performed remotely.
 - b. Increasing the outdoor air supply when work is done indoors.
 - c. Improving air filtration.
 - d. Increasing physical distancing to the extent feasible.
 - e. Requiring respiratory protection in compliance with CCR, Title 8 section 5144.
 - f. Other applicable controls.

Ventilation

Buildings or structures with mechanical ventilation will have recirculated air filtered 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, filters with the highest compatible filtering efficiency will be used. High Efficiency Particulate Air (HEPA) air filtration units will be used in accordance with manufacturers' recommendations in indoor areas occupied by employees for extended periods, where ventilation is inadequate to reduce the risk of COVID-19 transmission.

These ventilation requirements will continue to be implemented after the outbreak has passed and CCR, Title 8 section 3205.1 is no longer applicable.

Major Outbreaks

The following will be done while CCR, Title 8 section 3205.1 applies if 20 or more employee COVID-19 cases in an exposed group visited the worksite during their infectious period within a 30-day period:

1. The COVID-19 testing will be required of all employees in the exposed group, regardless of vaccination status, twice a week or more frequently if recommended by **SFDPH**. Employees in the exposed group will be tested or excluded and follow our CPP return to work requirements. The twice a week testing requirement ends when there are fewer than three new COVID-19 cases in the exposed group for a 14-day period. We will then follow weekly testing requirement until there are one or fewer new COVID-19 cases in the exposed group for a 14-day period.
2. Report the outbreak to Cal/OSHA.
3. Provide respirators for voluntary use to employees in the exposed group, encourage their use, and train employees according to CCR, Title 8 section 5144(c)(2) requirements.
4. Any employees in the exposed group who are not wearing respirators as required will be separated from other persons by at least six feet, except where it can be demonstrated that at least six feet of separation is not feasible, and except for momentary exposure while persons are in movement. Methods of physical distancing include:
 - a. Telework or other remote work arrangements.
 - b. Reducing the number of persons in an area at one time, including visitors.
 - c. Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.

- d. Staggered arrival, departure, work, and break times.
- e. Adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.

When it is not feasible to maintain a distance of at least six feet, individuals will be as far apart as feasible.