COVID-19 Prevention Program

I. Policy

It is the policy of California State University, San Marcos to maintain, insofar as can reasonably be expected, a campus environment for faculty, staff, students and the public that will not adversely affect their health and safety nor subject them to avoidable risks of accidental injury or illness. CSUSM also requires compliance where the word "shall" is used and offers guidance when the word "should" is used.

The purpose of this program is to outline the CSUSM procedures to identify potential COVID-19 exposure hazards and mitigate these hazards to prevent the spread of COVID-19 on campus.

II. Authority & Accountability

8 CCR §3205-3205.4
CA Labor Code §6409.6
CA Labor Code §3212.86, §3212.87, and §3212.88

Any campus community member or volunteer who discriminates, harasses or retaliates against another member of the campus community for wearing or not wearing a face covering or fails to adhere to the mitigation measures noted below is in violation of this program. If a contractor, vendor or visitor discriminates, harasses or retaliates against a member of the campus community for wearing or not wearing a face covering or fails to comply with campus protocol, they may be barred from campus owned or leased property and have their business relationship with the campus suspended or terminated.

III. Scope

This program applies to all CSUSM employees, students, and visitors who come on campus with the exception of those employees covered under the Aerosol Transmissible Disease Infection Control Plan. (At this time only specific Student Health & Counseling Services employees are covered under the infection control plan.)

IV. Definitions

**Exposure Investigation Team:** COVID Case Management Team responsible for receiving and tracking COVID-19 cases and coordinating response activities.
**Close Contact:** Someone who was within 6 feet of a person infected with COVID-19 for a cumulative total of 15 minutes or more over a 24-hour period with someone who has COVID-19, unless you have been fully vaccinated. People who are fully vaccinated do NOT need to quarantine after contact with someone who had COVID-19 unless they have symptoms.

**COVID-19 (Coronavirus Disease 2019):** the disease caused by SARS-CoV-2 (severe acute respiratory syndrome coronavirus 2).

**COVID-19 case:** a person who:

A. Has a positive “COVID-19 test” as defined in this section; or
B. Has a positive COVID-19 diagnosis from a licensed health care provider; or
C. Is subject to a COVID-19-related order to isolate issued by a local or state health official; or
D. 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.

**COVID-19 hazard:** 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, 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.

**COVID-19 symptoms:** 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.

**COVID-19 test:** a test for SARS-CoV-2 that is:

A. Cleared, approved, or authorized, including in an Emergency Use Authorization (EUA), by the United States Food and Drug Administration (FDA) to detect current infection with the SARS-CoV-2 virus (e.g., a viral test);
B. Administered in accordance with the authorized instructions; and
C. Not both self-administered and self-read unless observed by the employer or an authorized telehealth proctor. Examples of tests that satisfy this requirement include tests with specimens that are processed by a laboratory (including home or on-site collected specimens which are processed either individually or as pooled specimens), proctored over-the-counter tests, point of care tests, and tests where specimen collection and processing is either done or observed by an employer.
Exposed Group: 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 while everyone is wearing face coverings, 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, for instance a work crew or shift that does not overlap with another work crew or shift, only employees within that distinct group are part of the exposed group.

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, and the COVID-19 case was wearing a face covering during the entire visit, other people at the work location, working area, or common area are not part of the exposed group.

NOTE: An exposed group may include the employees of more than one employer. See Labor Code sections 6303 and 6304.1.

Face covering: 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 (i.e., fabrics that do not let light pass through when held up to a light source) that completely covers the nose and mouth and is secured to the head with ties, ear loops, or elastic bands that go behind the head. If gaiters are worn, they shall have two layers of fabric or be folded to make two layers. A face covering is a solid piece of material without slits, visible holes, or punctures, and must fit snugly over the nose, mouth, and chin with no large gaps on the outside of the face. A face covering does not include a scarf, ski mask, balaclava, bandana, turtleneck, collar, neck gaiter, or single layer of fabric.

This definition includes clear face coverings or cloth face coverings with a clear plastic panel that, despite the non-cloth material allowing light to pass through, otherwise meet this definition and which may be used to facilitate communication with people who are deaf or hard-of-hearing or others who need to see a speaker’s mouth or facial expressions to understand speech or sign language respectively.

Fully Vaccinated (Cal/OSHA): the employer has documented:

A. A person’s status two weeks after completing primary vaccination with a COVID-19 vaccine with, if applicable, at least the minimum recommended interval between doses in accordance with the approval, authorization, or listing that is:
   1. Approved or authorized for emergency use by the FDA;
   2. Listed for emergency use by the World Health Organization (WHO); or
   3. Administered as part of a clinical trial at a U.S. site, if the recipient is documented to have primary vaccination with the active (not placebo) COVID-19 vaccine candidate, for which vaccine efficacy has been independently confirmed (e.g., by a data and safety monitoring board) or if the clinical trial participant at U.S. sites had received a COVID-19 vaccine that
is neither approved nor authorized for use by FDA but is listed for emergency use by WHO; or

B. A person’s status two weeks after receiving the second dose of any combination of two doses of a COVID-19 vaccine that is approved or authorized by the FDA, or listed as a two-dose series by the WHO (i.e., a heterologous primary series of such vaccines, receiving doses of different COVID-19 vaccines as part of one primary series). The second dose of the series must not be received earlier than 17 days (21 days with a 4-day grace period) after the first dose; and

Fully Vaccinated and Up-to-Date (CSU Office of the Chancellor): a person’s status after receiving a complete COVID-19 vaccine series authorized by the FDA, or listed as a two-dose series by the WHO, with booster once they become booster eligible.

Isolation: the practice of separating sick people infected with COVID-19 from people who are not infected. The isolation period should last for 10 days following the first day the COVID-19 case symptoms are experienced.

High-risk exposure period: 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 10 days since 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 10 days after the specimen for their first positive test for COVID-19 was collected.

Quarantine: the practice of separating individuals who have had close contact with someone with COVID-19 to determine whether they develop symptoms or test positive for the disease. Quarantine reduces the risk of transmission if an individual is later found to have COVID-19. Quarantine for COVID-19 should last for 14 days after the exposure has ended. Fully-vaccinated individuals do not have to quarantine unless they develop symptoms following exposure to the COVID-19 case. Local, state, or federal guidance may require quarantine following travel. Quarantine may be shortened following the CDC’s guidance to reduce quarantine.

Worksite/A Specific Place of Employment:
A. Worksite (8 CCR 3205):
The building, store, facility, agricultural field, or other location where a COVID-19 case was present during the high-risk exposure period.

Does not apply to buildings, floors, or other locations of the employer that a COVID-19 case did not enter, locations where the worker worked by themselves without exposure to other employees.

B. A Specific Place of Employment (CA Labor Code 3212.88):
The building, store, facility, or agricultural field where an employee performs work at the employer’s direction.

Does not include the employee’s home or residence or alternative work location chosen by the worker when working remotely.
V. Responsibilities

A. Safety, Health & Sustainability

1. Maintain the COVID-19 Prevention Program (CPP). Make the program available to affected departments.
2. Provide assistance to individual departments concerning implementation of the program.
3. Provide consultation regarding federal, state, and local guidance.
4. Provide personal protective equipment, community protective equipment, hand sanitizer, and disinfectant products to campus departments through the Covered Cougar Distribution Center.
5. Conduct periodic inspections of in use areas.
6. Collaborate with the Exposure Investigation Team during investigations of outbreaks.

B. Exposure Investigation Team

1. Investigate reports of COVID-19 cases and potential exposures.
2. Collaborate with the Office of Human Resources (OHR) & Faculty HR regarding communication of COVID related benefits to employees.
3. Coordinate campus communication with the local health department.
4. Coordinate required notifications to affected employees and authorized representatives.
5. Notify SHS of exposed worksites and Cal/OSHA reportable incidents in a timely manner.

C. Office of Human Resources

1. Provide required notifications to employees and authorized representatives as applicable.
2. Provide required benefit information to employees and their authorized representatives as applicable.
3. For employees excluded from work under 8 CCR 3205 and otherwise able and available to work, OHR will continue and maintain an employee’s earnings, seniority, and all other employee rights and benefits, including the employee’s right to their former job status, as if the employee had not been removed from their job.

D. Department Supervisors and Managers

1. Ensure procedures prescribed herein are followed by employees.
2. Ensure that the training “Safety in the Workplace During COVID for CSUSM Employees” through CSU Learn in the Employee Training Center is mentioned to an employee if they are interested.
3. Report COVID-19 cases and potential exposures to the EXPOSURE INVESTIGATION Team.
4. Disseminate required notification emails to employees when a COVID-19 case has been on campus during their high-risk exposure period.

E. Employees

1. Report COVID-19 symptoms, positive tests, close contacts, or quarantine needs to their supervisor without fear of reprisal.

2. Complete training prior to returning to campus for work, if they are interested.

3. Complete required screening procedures.

4. Do not report to campus if sick without fear of reprisal.

5. Complete 10-day isolation if positive or diagnosed with COVID-19 or quarantine per directives from the COVID Coordination Team or their primary medical provider if identified as a member of an exposed group or a known contact of a COVID-19 case.

6. Communicate COVID-19 hazards to supervisors or SHS without fear of reprisal.

VI. Program

A. Communication

1. Procedure to report COVID-19 symptoms, possible close contacts, and possible COVID-19 hazards can be found here.

   a. The CSUSM As One website encourages the campus community to report symptoms, exposures, and hazards.

   b. Additional campus departments provide links to the reporting forms.

2. Procedures/Policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 Illness

   a. Employees:

      The Office of Human Resources coordinates with deans, managers, and divisions to provide appropriate accommodations for employees at high risk for serious COVID illness.

   b. Students:

      Many classes can utilize a virtual platform. The Cougar Care Network, Student Health & Counseling Services (SHCS), and Disability Support Services provide support to students with special needs who need assistance accessing virtual services.

3. Procedures Regarding COVID-19 Testing

   a. Employees: required to be tested weekly unless a valid vaccination record or qualifying exemption is on file.

   b. Students: all students participating in any in-person activities, classes or labs are required to be tested weekly unless a valid vaccination record or qualifying exemption is on file.
4. Procedures to communicate COVID-19 hazards (exposures) and policies to employees and others on campus.
   a. CSUSM As One provides links to the current status of COVID-19 cases and quarantine numbers, the campus mitigation and prevention policies, and the suspected positive case/exposure protocol.

B. Identification and Evaluation of COVID-19 Hazards

1. Employee and Authorized Employee Representative participation in the identification and evaluation of COVID-19 hazards.
   a. Area managers or MPP will be responsible for completing a workplace specific assessment of their areas to identify areas, activities and processes that could potentially expose employees to COVID-19 hazard.
   b. Employees may report areas and circumstances of COVID hazards (i.e. potential exposure) using the Report a Safety Concern online form, emailing Safety, Health & Sustainability (SHS), or calling SHS at 760.750.4502. Anonymous reporting is available when using the online form or calling.
   c. Collective bargaining units participate in the identification through direct reporting of unit members concerns and through participation in the Environmental Health, Occupational & Public Safety Committee (EHOPS).

2. COVID-19 Screening
   a. Employees are required to conduct a COVID-19 symptom self-assessment prior to arriving on any University property or participating in any University-related activity. Employees may use the CDC Coronavirus Self-Checker tool on a mobile device and/or download and print the CDC Symptoms of Coronavirus (COVID-19) Fact Sheet for personal reference. Employees will not need to submit the screening form through the campus app or website. By showing up at work, all employees are confirming that they are not experiencing any COVID-19 symptoms. Employees should stay home if they are sick. Anyone who is not coming to work because of COVID-19 symptoms should notify their manager.
   b. Students, visitors, and vendors reporting to campus are required to conduct a personal health assessment prior to arriving on any University property or participating in any University-related activity. Students, visitors, and vendors may use the CDC Coronavirus Self-Checker tool on a mobile device and/or download and print the CDC Symptoms of Coronavirus (COVID-19) Fact Sheet for personal reference. Students, visitors, and vendors will not need to submit the screening form through the campus app or website. By showing up on campus, all individuals are confirming that they are not experiencing any COVID-19 symptoms. Students, visitors, and vendors should not come to campus if they are sick.
   c. Anyone experiencing COVID-19 related symptoms may not come to the campus or participate in any University-related activity on University property. In addition, University community members who develop COVID-19 related symptoms while on University property or participating in any University-related activity must leave.
campus or remove themselves from a University-related activity. Any member of the University community who tests positive for COVID-19 or becomes aware that they may have been in close contact with someone who either has tested positive for or is suspected to have COVID-19 is strongly encouraged to report the positive result or exposure using the COVID-19 Self-Reporting Form.

3. Procedures to respond to a COVID-19 case in the workplace to prevent or reduce transmission.
   a. Employees:
      The Exposure Investigation team coordinates with the employee’s manager, the OHR, University Communications, Facility Services, SHS, and the County of San Diego to identify and quarantine close contacts; provide information on testing and isolation; safely and effectively clean and disinfect the affected workplace; and communicate required information to the appropriate campus community members in compliance with CA Labor Code §6409.6.
   b. Students:
      The Exposure Investigation team coordinates with Student Affairs, Academic Affairs, University Communications, Facility Services (FS), SHS, and the County of San Diego to identify and quarantine close contacts; provide information on testing and isolation; safely and effectively clean and disinfect affected spaces, if necessary; and communicate required information to the appropriate campus community members.
   c. Residential Students:
      In addition to the above, Housing & Residential Education has developed specific procedures to respond to a COVID-19 case amongst residents.

4. Identify workplace-specific areas, activities and processes that could potentially expose employees to COVID-19 hazards.
   a. The COVID-19 Response Team has coordinated a campus wide evaluation of workplaces to develop general COVID prevention procedures including instructions for a safe return, cleaning and disinfection procedures if a COVID-19 case is identified on campus, vehicle use procedures, and Research Guidance.

5. Evaluate how to maximize ventilation with outdoor air; the highest level of filtration efficiency compatible with the existing ventilation system; and whether the campus needs to provide an alternative solution for the space. This risk assessment will be conducted by SH&S, as needed and if necessary, to further reduce the risk of COVID-19 transmission. Energy Management & Utility Services evaluated the HVAC systems throughout campus. The ventilation systems, where feasible, utilize MERV13 or higher filters. Most laboratory systems already provide 100% fresh air intake. For other indoor spaces, the intake levels of fresh air were maximized to the extent compatible with the system.
6. Review applicable orders and guidance from the State of California and the local health department related to COVID-19 hazards and prevention.
   a. CSUSM follows CDPH COVID-19 guidance.
   b. The CSU Chancellor’s Office provides updates and guidance for the entire CSU system.
   c. Staff from various departments attend County of San Diego Colleges and Universities telebriefing and the CSU EHS Directors systemwide COVID update. The campus also maintains contacts with the county’s epidemiology department.

7. Evaluate existing COVID-19 prevention controls at the workplace and the need for different or additional controls.
   CSUSM evaluates and updates controls based on needs communicated by staff and students; changes to federal, state, and county guidance; and prevention gaps identified during case investigations.

8. Conduct periodic inspections as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with employers’ COVID-19 policies and procedures.
   a. SHS conducts periodic walk-throughs of laboratories and other high usage areas to identify areas of concern related to COVID-19.
   b. SHS has added COVID-19 observations to the annual health and safety inspections for those completed during Spring, Summer, Fall 2021, and Spring 2022. These will continue as needed depending on the needs of the campus community and the regulations.

C. Investigating and Responding to COVID-19 Cases in the Workplace

1. The CSUSM Exposure Investigation Team investigates COVID-19 cases in the workplace and coordinates with the County of San Diego Health & Human Services Agency.

2. CSUSM takes the following actions when there has been a COVID-19 case on campus:
   a. The Exposure Investigation team identifies the case’s last time on campus, test dates and/or diagnosis, and symptomology timeline.
   b. The Exposure Investigation team coordinates with the case’s department manager or college and the County to determine campus members who may have had a close contact.
   c. As applicable, the Exposure Investigation team works with University Communications, Housing & Residential Education, and other staff to provide required notifications (general and/or targeted) to campus members and others who may have been at the worksite and their authorized representatives as appropriate.
   d. The campus allows employees who had a close contact in the workplace to obtain free testing at the county testing site during working hours. The Office of Human Resources provides information on applicable leaves and other available benefits.
e. The Exposure Investigation team works with SHS as needed to investigate whether workplace conditions could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure to COVID-19 hazards.

3. Personal identifying information of COVID-19 cases or persons with COVID-19 symptoms, and any medical records required by 8 CCR §3205-3205.4 are kept confidential except when requested by the local health department, CDPH, the Division, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law.

D. Correction of COVID-19 Hazards

CSUSM corrects unsafe or unhealthy conditions, work practices, policies and procedures in a timely manner based on the severity of the hazard. SHS works with Facilities Development & Management (EMUS, PDC, FS) and the managers of the departments for which hazards have been identified to correct such hazards.

E. Training and Instructions

All employees may complete the appropriate *CSUSM Safety in the Workplace During COVID-19* training. The training is highly recommended for students and available in Cougar Courses.

The training includes:

1. CSUSM’s COVID-19 policies and procedures to protect employees from COVID-19 hazards and how to participate in the identification and evaluation of COVID-19 hazards.

2. Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.

3. The fact that COVID-19 is an infectious disease that can be spread through the air when an infectious person talks or vocalizes, sneezes, coughs, or exhales; that COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth, although that is less common; and that an infectious person may have no symptoms.

4. The fact that particles containing the virus can travel more than six feet, especially indoors, therefore increased ventilation indoors, face coverings, voluntary use of respiratory protection (respirators), and vaccination decrease the spread of COVID-19 and are most effective when used in combination.

5. The fact that CSUSM employees may request a respirator for voluntary use, as stated in this section, without fear of retaliation and at no cost to the employees. Employees may request N95 respirators (which requires training) by submitting a resource request through the *Covered Cougar Distribution Center* (CCDC). Whenever respirators are provided for voluntary use under this section or sections 3205.1 through 3205.4, they will receive training that informs them:

a. How to properly wear the respirator provided;

b. How to perform a seal check according to the manufacturer’s instructions each time a respirator is worn, and the fact that facial hair interferes with a seal.
6. The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.

7. Proper use of face coverings with the understanding they are not respiratory protective equipment. COVID-19 is an airborne disease. N95s and other more protective respirators protect the users from airborne disease while face coverings primarily protect people around the wearer.

8. COVID-19 symptoms, and the importance of not coming to work and obtaining a COVID-19 test if the employee has COVID-19 symptoms.

9. Information on CSUSM COVID-19 policies; how to access COVID-19 testing and vaccination; and the fact that vaccination is effective at preventing COVID-19, protecting against both transmission and serious illness or death.

10. The conditions under which face coverings must be worn on campus and in vehicles and that face coverings are additionally recommended outdoors for people who are not fully vaccinated if six feet of distance between people cannot be maintained. Employees can request face coverings from the CCDC at no cost to the employee and can wear them at work, regardless of vaccination status, without fear of retaliation.

F. Vaccination

1. In accordance with CSU Chancellor and University Communications on January 3, 2022, all CSU students, faculty, and staff who are accessing campus facilities are required to be immunized against SARS-CoV-2, the virus that causes COVID-19.

2. Exceptions to the vaccination mandate will be made for those with approved medical and religious exemptions.

3. Check the CSUSM As One or the CSU Vaccination and Information Resource page for information on where to get vaccinated.

4. Employees are required to submit proof of vaccination status. Proof of vaccination can be uploaded securely through the CSUSM app by tapping “COVID Resources” followed by “Employee Certification.” Alternatively, employees can visit the online webpage and follow instructions to attest and upload their vaccination card.

G. Physical Distancing

1. Physical distancing or barrier requirements regardless of vaccination status are no longer mandated but for very limited circumstances such as outbreaks; to the extent they are still recognized as an effective control measure.

2. All employees must be separated from other persons by at least six feet when: actively eating and drinking on campus, unvaccinated individuals that are exempt from wearing a face covering, or they cannot wear a restrictive alternative, unless tested weekly.

3. During an outbreak (3 or more positive COVID-19 cases reported within a 14-day period) the following will apply:
a. Employees in the exposed group, regardless of vaccination status, will wear face coverings when indoors, or when outdoors and less than six feet apart (unless one of the face-covering exceptions indicated in our CPP apply).

b. CSUSM will evaluate whether to implement physical distancing of at least six feet between persons, or where six feet of physical distancing is not feasible, the possibility of an alternative mitigation strategy.

H. **Face Coverings**

1. Refer to the Authority and Accountability section.

2. In accordance with the protocols communicated in the March 21, 2022 University Communications email, all students and employees, regardless of vaccination status, are required to wear a mask indoors while in instructional spaces, including within classrooms, teaching laboratories and Kellogg Library, as well as in health settings, like the Student Health & Counseling Services building.

3. Unvaccinated employees are required to wear masks indoors, in a vehicle, or outside when 6 feet of distance from others cannot be maintained.

4. Employees may request masks or N95 respirators (which requires training) by submitting a resource request through the [Covered Cougar Distribution Center](#) (CCDC).

5. Employees that are required to wear face coverings may remove them when:
   a. The employee is alone in a room or a vehicle.
   b. While actively eating or drinking at the workplace and are at least six feet apart.
   c. Employees are required to wear respirators in accordance with our respirator program that meet section 5144 requirements.
   d. 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 will wear an effective, non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition permits it.
   e. Specific tasks that cannot feasibly be performed with a face covering. This exception is limited to the time in which such tasks are being performed.

6. 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 requires a medical exemption from Human Resources. Such employees will wear a face shield with a drape if their condition permits it.

7. Employees who cannot wear a face covering or face shield will contact OHR to discuss accommodations.

8. Face coverings for employees and students are provided through the [Covered Cougar Distribution Center](#) and in vending machines throughout campus. Face coverings are worn over the nose and mouth when required by orders from the CDPH or local health department. Specific guidance is provided on the [SHS](#) and [CSUSM As One](#) websites.
9. CSUSM supports employees continuing to wear masks at any time and will not tolerate any reprisals or negative workplace responses including verbal harassment, teasing, or requests to justify actions. Please contact Human Resources (staff/MPPs) or Faculty Affairs (faculty) to report a concern.

I. Other Engineering Controls, Administrative Controls, and PPE

1. Solid Partitions

At fixed work locations where the customer service areas have existing cleanable solid partitions, depending on the community served, they may choose to keep this engineering control. Per CDPH & Cal OSHA, solid partitions are no longer required for infection control of COVID-19.

2. Ventilation

In response to COVID-19, Facilities, Development and Management has implemented the following measures in accordance with Cal OSHA requirements, California Department of Public Health requirements, and recommendations made by the CDC, ASHRAE, and the Chancellor’s Office:

- Analyzed and replaced all campus building HVAC filters. Most filters already had a rating of MERV 13 or 14. (MERV – Minimum Efficiency Reporting Values – measures how much matter passes through an air filter. MERV ratings are on a scale of one to 20 depending on the minimum size of the particles a filter can be expected to filter). In systems not designed for MERV 13 or 14, those filters were upgraded to as high a MERV rating as possible.
- Maximized the amount of outside air drawn into buildings.
- Ran building HVAC systems for longer hours so that the buildings are “flushed” two hours before and after occupancy.
- Disabled our Demand Control Ventilation systems allowing more outside air into the buildings while purging CO2.

All of our HVAC systems go through regular preventive maintenance by FDM’s highly trained, qualified technicians.

3. Cleaning and Disinfection

a. CSUSM’s cleaning and disinfection protocols will return to pre-pandemic status. The exception to this is if there is a confirmed COVID-19 case on campus, in which case enhanced cleaning procedures may be utilized depending on the risk assessment, the location and timing of the case.

b. Enhanced cleaning may be performed if the space in which a COVID-19-positive person was present will be occupied within 24 hours following the positive case being in the space.

c. To the extent feasible, items that employees come in regular physical contact with such as phones, headsets, desks, keyboards, writing materials, instruments, and tools is minimized.
d. If it is determined that cleaning and/or disinfection of areas, material, and equipment used by a COVID-19 case during the high-risk exposure period is necessary then it will be conducted by Facility Services, Principal Investigators, Instructional Support Technicians, or other staff as designated.

Any person wishing to perform additional cleaning or disinfecting of their personal workspace or equipment can obtain cleaning/sanitizing supplies by contacting the CCDC.

4. Handwashing
   a. CSUSM promotes hand hygiene activities through training, signage, guidance, websites, and accessibility.
   b. CSUSM evaluated its handwashing facilities and allows time for employee handwashing.
   c. Approved hand sanitizer stations had been installed throughout campus
   d. CSUSM encourages employees to wash their hands for at least 20 seconds each time.

5. Personal Protective Equipment
   a. CSUSM evaluates the need for personal protective equipment to prevent exposure to COVID-19 hazards, such as gloves, goggles, and face shields, and provide such personal protective equipment as needed. Such evaluations are conducted by SHS in coordination with individual departments as part of the Return to Campus work plan process.
   b. Upon request, CSUSM will provide respirators for voluntary use by unvaccinated employees who work indoors or in vehicles with more than one person in compliance with 8 CCR §5144(c)(2).
   c. SHCS provides and ensures the use of eye protection and respiratory protection in accordance with 8 CCR §5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids. At this time, such employees are covered under the Student Health and Counseling Services Aerosol Transmissible Disease Infection Control Plan.

J. Reporting, Recordkeeping, and Access

   1. The Exposure Investigation team reports information about COVID-19 cases and outbreaks at the workplace to the local health department whenever required by law, and provides any related information requested by the local health department.
   2. The Exposure Investigation team coordinates with the OHR and SHS to immediately report any COVID-19-related serious illnesses or death of an employee occurring in a place of employment or in connection with any employment to Cal/OSHA.
   3. CSUSM maintains records of the steps taken to implement the written COVID-19 Prevention Program, such as training and inspection reports, in accordance with 8 CCR section 3203(b).
4. This written COVID-19 Prevention Program will be made available to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.

5. The Exposure Investigation Team maintains a record of and tracks all COVID-19 cases with the employee’s name, contact information, occupation, location where the employee worked, the date of the last day at the workplace, and the date of a positive COVID-19 test.

K. Exclusion of COVID-19 Cases and Close Contacts

1. The Exposure Investigation Team coordinates the exclusion of COVID-19 cases and employees who had a close contact from the physical workplace with consultation from the Office of Human Resources, and in accordance with the most recent public health orders and CDC guidance.

2. Managers will ensure that COVID-19 cases are excluded from the workplace until the return-to-work requirements have been met.

3. CSUSM will exclude employees with a COVID-19 close contact from the workplace in accordance with the current County of San Diego Quarantine of Persons Exposed to COVID-19 health order unless they meet either of the following conditions:

   a. Employees who were fully vaccinated with booster or not yet eligible for a booster before the close contact and who do not develop COVID-19 symptoms:
      i. Test on day 5;
      ii. Wear a well-fitting face covering for 10 days when around others.

   b. Employees who were unvaccinated or fully vaccinated and booster eligible before the close contact and who do not develop COVID-19 symptoms:
      i. Stay home for minimum 5 days after last contact with person who has COVID-19;
      ii. Test on day 5;
      iii. Wear a well-fitting face covering for 10 days when around others;
      iv. May end quarantine after day 5 if they have no symptoms or symptoms are resolving and have a negative test result taken on day 5 or later; or
      v. May end quarantine after day 10 if no test is taken and they have no symptoms or symptoms are improving.
4. Anyone who develops symptoms or tests positive for COVID-19 during the quarantine period is required to isolate. They must wear a well-fitting mask for the next 10 days when around others and remain in isolation until the following conditions are met:

   a. May end isolation after day 5 if they have no symptoms or symptoms are resolving and have a negative test result taken on day 5 or later; or
   b. May end isolation after day 10 if no test is taken and they have no symptoms or symptoms are improving;
   c. Until fever resolves if fever is present

5. After ending quarantine, the contact should:

   a. Watch for symptoms for 10 days after exposure. If symptoms develop within the 10-day window, immediately self-isolate.
   b. Wear a mask, stay at least 6 feet from others, wash your hands, avoid crowds, and take other steps to prevent the spread of COVID-19 until day 10.

6. Fully vaccinated employees that are not required to quarantine following exposure to COVID-19 are strongly recommended to mask and monitor for symptoms for 14-days following the exposure. Additionally, they should test between day 3-5 post-exposure to check for infection.

7. For employees excluded from work under this regulation and otherwise able and available to work, OHR will continue and maintain an employee’s earnings, seniority, and all other employee rights and benefits, including the employee’s right to their former job status, as if the employee had not been removed from their job.

8. At the time of exclusion, OHR will provide the employee the information on benefits.

L. Return to Work Criteria

1. The Exposure Investigation Team will coordinate with the OHR and the local health department, as needed, to determine an employee’s allowable return to work date.

2. COVID-19 cases with COVID-19 symptoms shall not return to work until:

   a. At least 24 hours have passed since a fever of 100.4°F or higher has resolved without the use of fever-reducing medications; and
   b. COVID-19 symptoms have improved; and
   c. At least 10 days have passed since COVID-19 symptoms first appeared.

3. COVID-19 cases who tested positive but never developed COVID-19 symptoms shall 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.

4. Once the conditions noted above in number 2 and 3 are met, a negative COVID-19 test shall not be required for an employee to return to work.
5. 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.

6. Employees that travel, whether for business or personal reasons, should follow CDC travel guidance for quarantining after travel and other precautions that should be taken during travel.

M. Multiple COVID-19 Infections and COVID-19 Outbreaks (8 CCR §3205.1)

If three or more employee COVID-19 cases within an exposed group were present on campus during their high-risk exposure period at any time during a 14-day period, the requirements below will be completed and continue until there are no new COVID-19 cases in the exposed group detected in a workplace for a 14-day period.

1. COVID-19 Testing
   a. All employees in the exposed group will be offered testing with exceptions noted below. Such testing is available at no cost to employees during employees’ working hours at the county testing site.
      i. Employees who were not present on campus during the relevant period.
      ii. Employees who were fully vaccinated before the outbreak and who do not have COVID-19 symptoms.
      iii. For COVID-19 cases who did not develop COVID-19 symptoms after returning to work pursuant to the exclusion section, no testing is required for 90 days after the initial onset of COVID-19 symptoms or, for COVID-19 cases who never developed symptoms, 90 days after the first positive test.
   b. COVID-19 testing shall consist of the following:
      i. Immediately upon being covered by this section, all employees in the exposed group will be offered testing and then encouraged to test again one week later. Negative COVID-19 test results of employees with COVID-19 exposure shall not impact the duration of any isolation, quarantine, or exclusion period required by, or orders issued by, the local health department.
      ii. After the first two COVID-19 tests noted above, employees who remain at the workplace shall be offered testing continuously at least once per week, or more frequently if recommended by the local health department, until this section no longer applies.
      iii. Employees shall be offered additional testing when deemed necessary by the Cal/OSHA through the Issuance of Order to Take Special Action, in accordance with title 8, section 332.3.
   c. COVID-19 testing will be available on campus and available to students, faculty, and staff. Check the CSUSM As One page for more information. The Mandatory Testing section shows on campus testing locations.
2. Additional Work Practices
   a. Employees in the exposed group will wear face coverings when indoors, or when outdoors and less than six feet from another person, unless one of the face covering exceptions noted earlier applies.
   b. CSUSM will provide a notice to employees in the exposed group reminding them of their right to request a respirator for voluntary use if they are not fully vaccinated.
   c. CSUSM will evaluate whether to implement physical distancing of at least six feet between persons or, where six feet of physical distancing is not feasible, the use of cleanable solid partitions of sufficient size to reduce COVID-19 transmission.

3. COVID-19 Investigation, Review and Hazard Correction
   During an outbreak, CSUSM will immediately perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed with the intent to prevent further spread of COVID-19. The investigation and review will be documented and include:
   a. Investigation of new or unabated COVID-19 hazards including CSUSM’s leave policies and practices and whether employees are discouraged from remaining home when sick; the COVID-19 testing policies; insufficient outdoor air; insufficient air filtration; and lack of physical distancing.
   b. The review will be updated every thirty days that the outbreak section applies, in response to new information or to new or previously unrecognized COVID-19 hazards, or when otherwise necessary.
   c. CSUSM will implement changes to reduce the transmission of COVID-19 based on the investigation and review including moving indoor tasks outdoors or having them performed remotely, increasing outdoor air supply when work is done indoors, improving air filtration, increasing physical distancing as much as feasible, respiratory protection, and other applicable controls.

4. Ventilation
   In buildings or structures with mechanical ventilation, CSUSM will 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, CSUSM will use filters with the highest compatible filtering efficiency. FDM and SH&S will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units or other air cleaning systems would reduce the risk of transmission and, if so, shall implement their use to the degree feasible.

N. Major COVID-19 Outbreaks (8 CCR §3205.2)
   If 20 or more employee COVID-19 cases within an exposed group were present on campus during their high-risk exposure period at any time during a 30-day period, the requirements below will be completed and continue until there are fewer than 3 COVID-19 cases in the exposed group detected in a workplace for a 14-day period.
1. COVID-19 Testing

All employees in the exposed group will be offered testing twice a week (or more frequently if recommended by the local health department) regardless of their vaccination status.

2. Respirators

   a. CSUSM will provide a respirator for voluntary use to employees in the exposed group.
   
   b. CSUSM will determine the need for changes to the existing respiratory protection program under 8 CCR §5144 to address COVID-19 hazards.

3. Physical Distancing

   a. Employees in the exposed group who are not wearing a respirator required by CSUSM will maintain a distance of 6 feet from others.
   
   b. If six feet of distance is not feasible, then individuals will be as far apart as feasible.

In addition to the practices noted in the general and outbreak sections, CSUSM will evaluate whether to halt some or all operations at the workplace until COVID-19 hazards have been corrected.

O. COVID-19 Prevention in Employer-Provided Housing (8 CCR §3205.3)

1. CSUSM does not provide employer-provided housing.

2. Resident Directors and Resident Advisors lease housing from CSUSM Corporation. These units are considered private residences.

P. COVID-19 Prevention in Employer-Provided Transportation (8 CCR §3205.4)

To the extent feasible, we reduce exposure to COVID-19 hazards by assigning employees sharing vehicles to distinct groups and ensuring that each group remains separate from other such groups during transportation, during work activities, and in employer-provided housing.

1. Transportation Assignments

   CSUSM prioritizes assignments in the following order:
   
   a. Employees residing in the same housing unit are transported in the same vehicle.
   
   b. Employees working in the same crew or workplace are transported in the same vehicle.
   
   c. Employees who do not share the same household, work crew or workplace are transported in the same vehicle only when no other transportation alternatives are feasible.
2. Face Coverings and Respirators CSUSM ensures that:
   a. Face covering requirements of our CPP are followed for employees waiting for transportation, if applicable.
   b. All employees who are not fully vaccinated are provided with a face covering, which must be worn unless an exception under our CPP applies.
   c. Upon request, we provide respirators for voluntary use in compliance with subsection 5144(c)(2) to all employees in the vehicle who are not fully vaccinated.

3. Screening
   The same screening procedures as those described in section B of the Program section above apply to drivers and riders of University provided transportation.

4. Cleaning and Disinfecting CSUSM ensures that:
   a. All high-contact surfaces (door handles, seatbelt buckles, armrests, etc.) used by passengers are cleaned to prevent the spread of COVID-19 and are cleaned and disinfected if used by a COVID-19 case during the high-risk exposure period, when the surface will be used by another employee within 24 hours of the COVID-19 case.
   b. All high-contact surfaces used by drivers, such as the steering wheel, armrests, seatbelt buckles, door handles and shifter, are cleaned to prevent the spread of COVID-19 between different drivers and are disinfected after use by a COVID-19 case during the high-risk exposure period, if the surface will be used by another employee within 24 hours of the COVID-19 case.
   c. CSUSM provides sanitizing materials, training on how to use them properly, and ensure they are kept inadequate supply.

5. Ventilation
   CSUSM ensures that vehicle windows are kept open, and the ventilation system is set to maximize outdoor air and not set to recirculate air. Windows do not have to be kept open if one or more of the following conditions exist:
   a. The vehicle has functioning air conditioning in use and excessive outdoor heat would create a hazard to employees.
   b. The vehicle has functioning heating in use and excessive outdoor cold would create a hazard to employees.
   c. Protection is needed from weather conditions; such as rain or snow.
   d. The vehicle has a cabin air filter in use and the U.S. EPA Air Quality Index for any pollutant is greater than 100.
6. Hand Hygiene

CSUSM may provide hand sanitizer in each vehicle and ensure that all drivers and riders sanitize their hands before entering and exiting the vehicle. Hand sanitizers with methyl alcohol are prohibited.