

COVID-19 Prevention Program

This COVID-19 Prevention Program is part of **Odyssey Learning/Life Center's** Injury & Illness Prevention Program (IIPP) which was established to protect employees from workplace hazards, including infectious diseases. The following guidelines will be focused on COVID-19, also known as the Coronavirus.

System for Communicating

Employees are required to report to their direct supervisor and human resources department without fear of reprisal, with any COVID-19 symptoms, possible COVID-19 exposures, and possible COVID-19 hazards in the workplace.

Odyssey Learning/Life Center will make every attempt to provide employees with underlying health conditions that put them at an increased risk of severe COVID-19 illness with modified working conditions; this could include the reassignment to another workstation, temporary work from home requirement, or even a temporary assignment to another position if necessary. Any temporary reassignment will not have a negative impact on wages or seniority.

COVID-19 testing could be required under certain circumstances. If testing is required under this program, employees will be informed of the reason, and any possible consequences of a positive test. All work-related testing will be performed on company time, and at Odyssey Learning/Life Center's expense. All testing will be done in strict confidence, and information will only be shared with the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Health (NIOSH), or as required by law. All medical records will be kept confidential and will not be disclosed without employee's written consent.

Identification and Evaluation of COVID-19 Hazards

Employees and/or their authorized employee representative are allowed to participate in the identification and evaluation of COVID-19 hazards.

Odyssey Learning/Life Center has developed and implemented a process for screening employees for, and responding to employees with COVID-19 symptoms. The process for screening employees is as follows:

- Employees are asked to evaluate their personal health each day before coming to work. Employees are required to stay home from work if they have a fever over 100.4 degrees, frequent cough, difficulty breathing, chills, muscle pain, headache, sore throat, or recent loss of taste or smell.
- If an employee develops any of the above symptoms during their workday they should report immediately to their supervisor and human resources department. The supervisor will determine the appropriate course of action which could include sending the employee home for medical treatment.
- Once the employee has been cared for, the supervisor and/or other members of management will conduct an investigation into the potential COVID-19 case with the intent to prevent or reduce the risk of further transmission of COVID-19 in the workplace. The investigation could result in temporary closure of the work area where the exposed employee was working until proper cleaning measures can be completed. Any employees who were working with or near (within six feet) this employee will be screened, and could be required to be tested for COVID-19.

- Odyssey Learning/Life Center has identified the following work areas, work activities, processes and equipment that could possibly expose employees to COVID-19 hazards. For example, breakrooms, kitchens, restrooms or other areas where employees gather. These areas, work activities and processes will be continually monitored for additional controls, thus our policies and procedures could be adjusted as needed to provide maximum protection to employees and visitors.
- Odyssey Learning/Life Center will conduct periodic inspections as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with Odyssey Learning/Life Center COVID-19 Prevention Program.

Investigating and Responding to COVID-19 Cases

All potential exposures to COVID-19 in the work environment will be investigated; until the investigation is complete all potential cases will be assumed to have been positive cases. Investigations will be performed by management and the results excluding personal information will be communicated with all employees working in the area. All employees participating in the investigation will be required to wear the appropriate personal protective equipment (PPE) which includes at a minimum proper face covering and latex or nitrile gloves. All investigations are required to be documented.

The investigation will determine the day and time the COVID-19 case was last present and to the extent possible, the date of the positive COVID-19 test(s) and/or diagnosis, and the date the COVID-19 case first had one or more COVID-19 symptoms if any.

The investigation must determine who may have had a COVID-19 exposure; this will require an evaluation of the activities of the COVID-19 case and all locations at the workplace which may have been visited by the COVID-19 case during the exposure period.

Odyssey Learning/Life Center will give notice of the potential COVID-19 exposure within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case to the following:

- All employees who may have had COVID-19 exposure and their authorized representatives.
- Any independent contractors and other employers present at the workplace during the high-risk exposure period.

All employees who had potential exposure to COVID-19 in the workplace will be offered testing at no cost during their working hours; in addition, employees will be provided with information on wage continuance and benefits.

At the conclusion of the investigation Odyssey Learning/Life Center will implement any necessary policies and/or procedures for correcting unsafe or unhealthy conditions, work practices, policies and procedures in a timely manner based on the severity of the hazard.

Employee Training and Instruction

Odyssey Learning/Life Center will provide all employees with the necessary training and instruction that includes the following:

- Odyssey Learning/Life Center's COVID-19 policies and procedures to protect employees from COVID-19 hazards as part of our Injury & Illness Prevention Plan.
- Information regarding COVID-19 related benefits for which employees may be entitled under applicable federal, state and/or local laws. This includes any potential benefits under our workers

compensation policy, the federal Families First Coronavirus Response Act (expires 03/31/2021) and the applicable California Labor Codes.

- 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.
- The methods Odyssey Learning/Life Center is using to ensure physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the COVID-19 virus can travel more than six feet, especially indoors, 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 hot water for a minimum of 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 dirty.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment.
- An overview of the COVID-19 symptoms, and the importance of not coming to work and obtaining a COVID-19 test if the employee has COVID-19 symptoms.

Physical Distancing

All employees are required to be separated from other persons by at least six feet, except where Odyssey Learning/Life Center can demonstrate that six feet of separation is not possible, and except for momentary exposure while employees or other are walking. Methods of distancing include telework, or other remote arrangements that reduce the number of people in an area at one time, this includes visitors.

When it is not possible to maintain a distance of six feet, individuals shall be as far as part as possible and wearing an appropriate face covering.

Face Coverings

Odyssey Learning/Life Center will provide face coverings and ensure that they are worn by employees when indoors, or when outdoors and less than six feet away from another person; face coverings are to be worn over both the nose and mouth. Employees may use their own face covering as long as it is approved by management. The following are exceptions to the face covering requirements:

- When an employee is alone in a room.
- While eating or drinking in the workplace, provided employees are at least six feet apart.
- Employees who cannot wear a face covering due to a medical or mental health condition or disability.
- While performing a specific work task, 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, and the unmasked employee remains at least six feet away from all other persons.

Employees who have been exempted by Odyssey Learning/Life Center from wearing a face covering due to a medical or mental health condition will be required to wear an effective non-restrictive alternative such as a face shield with a drape on the bottom if their disability permits it.

Signs have been posted at all entrances notifying vendors and other visitors that face coverings are required; to protect our employees and visitor without a proper face covering will be prohibited from entering the facilities.

Other Engineering Controls, Administrative Controls and Personal Protective Equipment

At work locations where it is not possible to maintain the physical distancing requirements Odyssey Learning/Life Center has/will install cleanable solid partitions that effectively reduce aerosol transmission between the employee and other persons.

Odyssey Learning/Life Center will keep outside doors and windows open whenever possible for natural ventilation.

Odyssey Learning/Life Center has implemented cleaning and disinfecting procedures in accordance with the Center for Disease Control (CDC). Cleaning procedures include cleaning and disinfecting frequently touched surfaces and objects such as doorknobs, equipment, tools, handrails, handles, controls, bathroom surfaces, kitchen and breakroom surfaces and vehicle steering wheels.

Employees are prohibited from sharing personal protective equipment and to the extent feasible, items that employees come in regular physical contact with such as phones, headsets, desks, keyboards, writing materials, instruments and tools. When it is not feasible to prevent sharing, sharing shall be minimized and such items and equipment shall be disinfected between uses. When sharing vehicles is necessary the high touch points (steering wheel, door handles, seatbelt, and other controls) shall be disinfected between users.

Odyssey Learning/Life Center has determined that we have adequate handwashing facilities. Odyssey Learning/Life Center encourages frequent handwashing with soap and hot water for a minimum of 20-seconds. Odyssey Learning/Life Center has also made non-methyl hand sanitizer available in the workplace.

All personal protective equipment (PPE) is provided by Odyssey Learning/Life Center at no cost to the employees.

Reporting, Recordkeeping and Access

Odyssey Learning/Life Center is required to report information about positive COVID-19 cases in the workplace to the local health department.

Odyssey Learning/Life Center is required to report immediately to Cal/OSHA any COVID-19 related serious illnesses or death that can be reasonably connected to the workplace.

Odyssey Learning/Life Center is required to maintain records of the steps that we have taken to implement this written COVID-19 Prevention Program, which includes documented employee training.

Odyssey Learning/Life Center's written COVID-19 Prevention Program will be made available at the workplace to employees, authorized employee representatives, and to representatives from Cal/OSHA upon request.

Odyssey Learning/Life Center will maintain a record of, and track all COVID-19 cases with the employee's names, contact information, occupation, location where the employee worked, the date and the last day at the workplace, and the date of a positive COVID-19 test. Medical information will be kept

confidential. This information will be made available to employees, employee representatives, or as otherwise required by law with personal identifying information removed.

Exclusion of COVID-19 Cases

Odyssey Learning/Life Center shall ensure that COVID-19 cases are excluded from the workplace until the return to work requirements are met.

Employees with COVID-19 exposure will be excluded from the workplace for 14-days after the last known COVID-19 exposure to a COVID-19 case.

For those employees who are temporarily excluded from the workplace due to a positive COVID-19 test, or those excluded due to an exposure, and who otherwise would have been able and available for work Odyssey Learning/Life Center will continue your wages, seniority and all other rights and benefits. Odyssey Learning/Life Center will require you to use any accrued company provided sick leave benefits for this purpose unless it is determined your illness is covered by workers compensation. There are two exceptions and they are as follows:

- 1) Does not apply to any period of time during which the employee is unable to work for reasons other than protecting persons at the workplace from possible COVID-19 transmission.
- 2) Does not apply where Odyssey Learning/Life Center can demonstrate that the COVID-19 exposure is not work related.

Return to Work Criteria

Odyssey Learning/Life Center will not allow any COVID-19 cases with COVID-19 symptoms to return to work until:

- 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; and
- 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 be allowed to return to work until a minimum of 10-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 be allowed to 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.

Multiple COVID-19 Infections and COVID-19 Outbreaks

This section of the program will apply if the workplace were to be identified by a local health department as a location of a COVID-19 outbreak or when there are three or more COVID-19 cases in an exposed workplace within a 14-day period. This section would apply until there are no new COVID-19 cases detected in the workplace for a 14-day period.

Odyssey Learning/Life Center will provide COVID-19 testing to all employees at the exposed location except for employees who were not present during the period of the outbreak identified by the local health department or the relevant 14-day period as applicable. The COVID-19 testing will be provided at no cost to the employee during their working hours.

COVID-19 testing will be conducted immediately after an outbreak has been declared, then again one week later. A negative COVID-19 test result of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by the local health department.

After the first two COVID-19 tests required under this section, Odyssey Learning/Life Center will provide continuous COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department until this section no longer applies.

Odyssey Learning/Life Center will temporarily exclude COVID-19 cases and employees who had COVID-19 exposure from the workplace.

Odyssey Learning/Life Center will immediately investigate and determine possible workplace related factors that contributed to the COVID-19 outbreak in accordance with Cal/OSHA. In addition Odyssey Learning/Life Center 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. The investigation and review will be documented and will include:

- Investigation of new or abated COVID-19 hazards including Odyssey Learning/Life Center's leave policy and practices and whether employees were discouraged from remaining home when sick; Odyssey Learning/Life Center's COVID-19 testing policies; insufficient outdoor air; insufficient air filtration and lack of physical distancing.
- The review will be updated every 30-days that the outbreak continues, in response to new information or to new or previously unrecognized COVID-19 hazards or when otherwise necessary.
- Odyssey Learning/Life Center will implement changes to reduce the transmission of COVID-19 based on the investigation and review. Odyssey Learning/Life Center will consider moving indoor tasks outdoors, or having employees work remotely if possible. We will also increase outdoor air supply when applicable, and increase physical distancing as much as possible.

Odyssey Learning/Life Center will notify the local health department immediately, but no longer than 48-hours after we become aware, or with diligent inquiry would have known of three or more COVID-19 cases for guidance on preventing the further spread of COVID-19 within our workplace.

Odyssey Learning/Life Center will provide the health department the total number of COVID-19 cases and for each COVID-19 case, the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and any other information requested by the health department. Odyssey Learning/Life Center will continue to provide notice of any subsequent COVID-19 cases at the workplace.

Major COVID-19 Outbreaks

This section only applies if there were to be 20 or more COVID-19 cases in an exposed workplace within a 30-day period. This section would apply until there are no new COVID-19 cases detected in the workplace for a 14-day period.

In the event of a major outbreak Odyssey Learning/Life Center will provide twice weekly COVID-19 testing to all employees present at the exposed work location during the relevant 30-day period, and who remain at the workplace. Testing can be done more frequently if recommended by the local health

department. All testing will be conducted at no cost to the employees, and will be conducted during the employees working hours.

As similar to other COVID-19 cases, all positive COVID-19 cases and employees with COVID-19 exposure will be temporary excluded from the workplace.

Odyssey Learning/Life Center will conduct an immediate investigation and review as referenced in other section of this program and take the necessary steps to prevent further transmission of COVID-19 within the workplace. In addition, Odyssey Learning/Life Center will take the following actions:

In buildings or structure with mechanical ventilation, Odyssey Learning/Life Center will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filter if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, Odyssey Learning/Life Center will use filters with the highest compatible filtering efficiency.

Employee Acknowledgement

I have read and understand my company's COVID-19 Prevention Program and agree to abide by all steps required of me.

Employee's Printed Name

Employee's Signature

Date