

COVID-19 Worker Protection Policy

Date: _____

Veterinary Practice Name ("Practice"): _____

Employer Name ("Employer"): _____

1) System for Communicating

- a. Employees should report to _____ any [COVID-19 symptoms](#), possible COVID-19 exposures, and possible COVID-19 hazards in the workplace. Employees should not fear reprisal for reporting.
- b. Employees with medical or other conditions that put them at an increased risk of severe COVID-19 illness will be accommodated in the following ways: _____
- c. COVID-19 testing is available in our area at the following locations: _____
- d. COVID-19 testing will be provided to employees at no cost during a COVID-19 outbreak, as defined in California Code of Regulations, Title 8, section 3205.1(a)-(c) (three or more cases in the workplace within a 14-day period).
- e. In cases of potential COVID-19 exposure, specified employees will receive notice of the potential exposure within one business day in a way that does not reveal any personal identifying information of the COVID-19 case. Specified employees include the following: All employees who may have had COVID-19 exposure and their authorized representatives and independent contractors and other employers present at the workplace during the high-risk exposure period.
 - i. The high-risk exposure period is the following time period:
 1. For persons who develop COVID-19 symptoms: from two days before they first develop symptoms until 10 days after symptoms first appeared, and 24 hours have passed with no fever without the use of fever-reducing medications, and symptoms have improved; or,
 2. For persons who test positive who never develop COVID-19 symptoms: from two days before until ten days after the specimen for their first positive test for COVID-19 was collected.

2) Training and Instruction

The Employer will provide effective training and instruction to employees that includes the following:

- a. The employer's COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- b. General information on the [symptoms of COVID-19](#).
- c. 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 workers' compensation law, the federal Families First Coronavirus Response Act, Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, local governmental requirements, the Employer's own leave policies, and leave guaranteed by contract.
- d. 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.
- e. The fact that although less common than airborne transmission, COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
- f. The fact that an infectious person may have no symptoms.
- g. Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.

- h. 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.
- i. 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.
- j. The proper use of face coverings and the fact that face coverings are not respiratory protective equipment.
- k. COVID-19 symptoms, and the importance of obtaining a COVID-19 test, and not coming to work, if the employee has COVID-19 symptoms.

3) General COVID-19 Safety Procedures

The Employer will, on a continual basis, evaluate existing COVID-19 prevention controls at the workplace and the need for different or additional controls. The Employer will also review applicable orders and guidance from the State of California and the local health department related to COVID-19 hazards and prevention, including information of general application and information specific to the veterinary industry, this premises location, and this business's operations.

Employees who do not comply with these provisions will be directed to do so by the Employer and are subject to disciplinary action for violation of these workplace policies.

- a. **Physical Distancing:** All employees will be separated from other persons by at least six feet, except where the nature of work tasks being performed make this degree of separation impossible, and except for momentary exposure while persons are in movement. Methods of physical distancing include: telework or other remote work arrangements; reducing the number of persons in an area at one time, including clients or other visitors; visual cues such as signs and floor markings to indicate where employees, clients, and others should be located or their direction and path of travel; staggered arrival, departure, work, and break times; and adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.

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

- b. **Personal Protective Equipment:** The Employer will evaluate 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.
 - i. **Face Coverings:** Face coverings in the form of clean, undamaged masks will be provided to employees. Employees will wear masks to cover the nose and mouth when indoors, when outdoors and less than six feet away from another person, and where required by orders from the California Department of Public Health (CDPH) or local health department. Face shields are not a replacement for face coverings, although they may be worn together for additional protection.

The following are exceptions to the face coverings requirement:

1. When an employee is alone in a room.
2. When eating and drinking at the workplace, provided employees are at least six feet apart if indoors, and outside air supply to the area has been maximized in the area to the extent possible.
3. When the employee is wearing a respirator.
4. When an employee cannot wear a face covering due to a medical or mental health condition or disability, or when the employee is hearing-impaired or communicating with a hearing-impaired person. Employees exempted from wearing face coverings due to a medical condition, mental health condition, or disability will wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits it.
5. When engaging in specific tasks that 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 will be at least six feet

away from all other persons unless unmasked employees are tested at least twice weekly for COVID-19.

Any employee not wearing a face-covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, will be at least six feet apart from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19. Employers may not use COVID-19 testing as an alternative to face coverings when face coverings are otherwise required by this section.

Employees will not be prevented from wearing a face covering when not required by this section, unless it would create a safety hazard, such as interfering with the safe operation of equipment.

The following measures will be taken to communicate to non-employees (clients, other patrons) the face coverings requirements on this premises: _____

- ii. Other Personal Protective Equipment: The Employer will evaluate the need for respiratory and eye protection in accordance with [California Code of Regulations, Title 8, section 5144](#) when a minimum of physical distance cannot be maintained as specified in section 3.b., above, or when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids. If respiratory or eye protection is needed, the Employer shall provide such equipment and ensure that its use is in accordance with section 5144.
- c. General Engineering and Administrative Controls: The Employer will, on a continual basis, evaluate existing COVID-19 prevention controls at the workplace and the need for different or additional controls. The Employer will also review applicable orders and guidance from the State of California and the local health department related to COVID-19 hazards and prevention, including information of general application and information specific to the veterinary industry, this premises location, and this business's operations.
 - i. At fixed work locations where it is not possible to maintain the physical distancing requirement at all times, the Employer will install cleanable solid partitions that effectively reduce aerosol transmission between the employee and other persons.
 - ii. The Employer will maximize the quantity of outside air provided to the extent feasible, except when the United States Environmental Protection Agency (EPA) Air Quality Index is greater than 100 for any pollutant or if opening windows or letting in outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.
 - iii. The Employer will implement cleaning and disinfecting procedures, which require:
 - 1. Identifying and regularly cleaning and disinfecting frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, bathroom surfaces, and steering wheels. The Employer will inform employees and authorized employee representatives of cleaning and disinfection protocols, including the planned frequency and scope of regular cleaning and disinfection.
 - 2. Prohibiting the sharing of (a) personal protective equipment and (b) to the extent feasible, items with which employees come in regular physical contact, such as phones, headsets, desks, keyboards, writing materials, instruments, and tools. When it is not feasible to prevent sharing, sharing will be minimized and such items and equipment will be disinfected between uses by different people. Sharing of vehicles will be minimized to the extent feasible, and high touch points (steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users.
 - 3. Cleaning and disinfection of areas, materials, and equipment used by a COVID-19 case during the high-risk exposure period. NOTE: Cleaning and disinfecting must be done in a manner that does not create a hazard to employees.

- d. [Hand Washing](#): To protect employees from COVID-19 hazards, the Employer will evaluate hand washing facilities, determine the need for additional facilities, encourage and allow time for employee hand washing, and provide employees with an effective hand sanitizer. The Employer will encourage employees to [wash their hands](#) for at least 20 seconds each time. Provision or use of hand sanitizers with methyl alcohol is prohibited.
- e. The following procedures are implemented to minimize employee exposure to COVID-19 hazards originating from any person, including a client or member of the public, not wearing a face covering and/or any instance in which maintaining a minimum physical distance of six feet is not possible: _____

4) Identification and Evaluation of COVID-19 Hazards

- a. Employees are encouraged to identify or participate in identifying COVID-19 hazards in the workplace.
- b. Employees displaying [symptoms consistent with COVID-19](#) will be screened before starting work.
 - i. Employees may self-screen by taking their temperature and evaluating their symptoms before coming to work. If screening takes place by another person in the workplace, face coverings will be worn during the screening, and non-contact thermometers will be used.
- c. The following policies and procedures are to be followed for employees with active cases of COVID-19, (this policy includes the exclusion of the employee from work during the time of active infection): _____

Following the identification of a COVID-19 positive individual in the workplace, all interactions, areas, activities, processes, equipment, and materials that could potentially expose employees to COVID-19 hazards will be identified by the Employer. All persons determined to have interacted with the positive individual, and/or determined to have come into contact with the identified areas, activities, processes, equipment or materials will be treated as potentially infectious. This will include identification of places and times when people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not, for instance during meetings or trainings and including in and around entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas. This will also include an evaluation of employees' potential workplace exposure 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. The Employer will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

- d. The following measures will be taken to maximize the quantity of outdoor air in the premises and to maximize the efficiency and effectiveness of the existing ventilation system: _____
- e. Periodic inspections will be conducted as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure workplace compliance with this business's COVID-19 policies and procedures.

5) Investigating and Responding to COVID-19 Cases in the Workplace

- a. The following procedure will be used to investigate COVID-19 cases in the workplace:
 - i. COVID-19 case status will be verified by receipt and review of test results, evaluation of onset of [symptoms](#), and identifying and recording cases.
- b. Where there has been a COVID-19 case in the workplace, the following actions will be taken:
 - i. The date and time that the individual(s) was/were last present will be determined. If possible, the date of the positive test results and/or diagnosis, and the date the COVID-19 case first showed symptoms (if any were experienced) will be identified. Personal identifying information of COVID-19 cases or persons with COVID-19 symptoms will be kept confidential. All medical records of such individuals will also be kept confidential. All COVID-19 testing or related medical services provided by the Employer will be provided in a manner that ensures the confidentiality of employees. EXCEPTION: Unredacted information on COVID-19 cases will be provided to the local health

department, the California Department of Public Health, Cal/OSHA Division of Occupational Safety and Health, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law immediately upon request.

- ii. Individuals who may have been exposed to the positive individual(s) will be identified by determining the activities of the positive individual(s) in the workplace during the high-risk period. The high-risk period is defined as either: (1) For persons who develop COVID-19 symptoms: from two days before they first develop symptoms until 10 days after symptoms first appeared, and 24 hours have passed with no fever without the use of fever-reducing medications, and symptoms have improved; or (2) for persons who test positive who never develop COVID-19 symptoms: from two days before until ten days after the specimen for their first positive test for COVID-19 was collected.
- iii. Notice will be given within one business day to employees and independent contractors potentially exposed to COVID-19 during the high-risk period (as defined above) in a way that does not reveal any personal identifying information of the COVID-19 positive individual(s).
- iv. COVID-19 testing will be offered at no cost during working hours to all employees who had potential COVID-19 exposure in the workplace, and such employees will be provided with information on benefits, including 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 workers' compensation law, the federal Families First Coronavirus Response Act, Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, local governmental requirements, the Employer's own leave policies, and leave guaranteed by contract.
- v. Exclusion from the Workplace
 1. The Employer will exclude any and all employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 positive individual. The Employer will ensure that employees positive for COVID-19 or with COVID-19 symptoms are excluded from the workplace until the requirements of section 6, below, are met.
 2. For employees excluded from work due to an active case of COVID-19 who are otherwise able and available to work (not ill), the Employer will continue and maintain the 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. The Employer may use Employer-provided employee sick leave benefits for this purpose and consider benefit payments from public sources in determining how to maintain earnings, rights, and benefits, where permitted by law and when not covered by workers' compensation.
 - a. EXCEPTION 1: This 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.
 - b. EXCEPTION 2: This does not apply where the Employer demonstrates that the COVID-19 exposure is not work-related.
 3. This section 5.b.(v) does not limit any other applicable law, Employer policy, or collective bargaining agreement that provides for greater protections.
 4. At the time of exclusion, the Employer will provide the employee the 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 workers' compensation law, the federal Families First Coronavirus Response Act, Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, local governmental requirements, the Employer's own leave policies, and leave guaranteed by contract. The Employer will also inform the employee of the information identified in section 5.v.2.a.-b. above.
 5. EXCEPTION: Employees who have not been excluded or isolated by the local health department need not be excluded by the Employer if they are

temporarily reassigned to work where they do not have contact with other persons until the return to work requirements of this Section 5 are met.

- vi. An investigation into whether the workplace conditions could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure will be conducted.

- vii. Correction of COVID-19 Hazards
 1. If unhealthy workplace conditions, work practices, or policies or procedures are identified, the following corrections will be implemented:
 - a. Sections 4 and 5 of this policy will be amended to reflect corrected practices, policies, and procedures.
 - b. Additional steps will be taken on a case-by-case basis to address safety hazards that arise in specific situations.

6) Return to Work Criteria (for employees with confirmed COVID-19 infection or who displayed symptoms consistent with COVID-19)

The Employer will ensure that employees testing positive for COVID-19 or with COVID-19 symptoms are excluded from the workplace until the following requirements are met:

- a. Employees positive for COVID-19 or with COVID-19 symptoms will not return to work until:
 - i. At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications;
 - ii. COVID-19 symptoms have improved; and
 - iii. At least 10 days have passed since COVID-19 symptoms first appeared.
- b. Employees who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
- c. A negative COVID-19 test will not be required for an employee to return to work.
- d. 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.
- e. If there are no violations of local or state health officer orders for isolation or quarantine, the Division of Occupational Safety and Health may, upon request, allow employees to return to work on the basis that the removal of an employee would create undue risk to a community's health and safety. In such cases, the Employer will develop, implement, and maintain effective control measures to prevent transmission in the workplace including providing isolation for the employee at the workplace and, if isolation is not possible, the use of respiratory protection in the workplace.

7) Reporting, Recordkeeping, and Access

- a. The Employer will report information about COVID-19 cases at the workplace to the local health department whenever required by law, and will provide any related information requested by the local health department.
- b. The Employer will report immediately to the Cal/OSHA Division of Occupational Safety and Health any COVID-19-related serious illnesses or death of an employee occurring in a place of employment or in connection with any employment.
- c. The Employer will maintain records of the steps taken to implement this written COVID-19 Prevention Policy.
- d. This written COVID-19 Prevention Policy will be made available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA Division of Occupational Safety and Health immediately upon request.
- e. The Employer will keep a record of and track 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. Medical information will be kept confidential. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed. Note: This subsection does not alter the right of employees or their representatives to request and obtain an Employer's Log of Work-Related Injuries and Illnesses (Log 300), without redaction, or to request and obtain information as otherwise allowed by law.