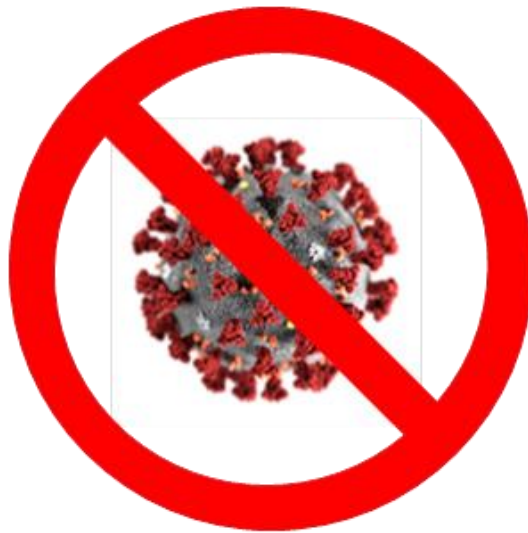




SAN FRANCISCO  
STATE UNIVERSITY

# San Francisco State University

Environment, Health & Safety Department



## COVID-19 Injury -Illness Prevention Program

Last Update: February 8, 2021

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**Cal/OSHA Title 8 Section 3205 (c) ...The written elements of a COVID-19 Prevention Program shall include:**

1. System for communicating. The employer shall do all of the following in a form readily understandable by employees:

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(A) Ask employees to report to the employer, without fear of reprisal, COVID-19 symptoms, possible COVID-19 exposures, and possible COVID-19 hazards at the workplace.

**SFSU Response**

Employee are required to report any symptoms on a phone app before coming to campus each day. The phone app will assess their reported symptoms and allow or deny access to the campus. Building Ambassadors wearing face coverings check the status of the phone app before allowing anyone into a campus building.

*On-line Working Safely at SFSU During the COVID-19 Pandemic* training required of all employees and students coming to campus provides information about this process.

Employees and students can also report COVID symptoms and test results by emailing the campus at [covid19@sfsu.edu](mailto:covid19@sfsu.edu) or using the COVID-19 NOTIFICATION link on the University's SF News and Campus Plan web page.

Employees can report any unsafe practice or condition to EHS using the SFSU EH&S phone app.

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(B) Describe procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.

**SFSU Response**

Employees at increased risk of COVID illness are to work from home.

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(C) Provide information about access to COVID-19 testing. If testing is required under this section, section 3205.1, or section 3205.2, the employer shall inform affected employees of the reason for the COVID-19 testing and the possible consequences of a positive test.

**SFSU Response**

Some no cost COVID testing is available on campus provided by a third party vendor.

When on-campus testing is not available, employees may be sent during work hours for testing (at no charge to the employee) to local testing facilities.

Free COVID testing is available in San Francisco. Go to

[Get Tested SF Covid-19 Testing Sites](#) or  
[San Francisco COVID-19 Testing Options Website](#).

The consequences of a positive test (quarantine etc.) are communicated in the on-line *Working Safely at SFSU During the COVID-19 Pandemic* training required of all employees and students coming to campus.

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(D) In accordance with subsection (c)(3)(B)3, communicate information about COVID-19 hazards and the employer's COVID-19 policies and procedures to employees and to other employers, persons, and entities within or in contact with the employer's workplace.

**SFSU Response: See also (c)(3)(B)**

The university's policies and procedures appear on the periodically updated University [SF News and Campus Plan](#) web page and are communicated in on-line *Working Safely at SFSU During the COVID-19 Pandemic* training required of all employees and students coming to campus.

Additionally, signage supporting these policies and procedures is posted throughout the campus.

**Cal/OSHA Title 8 Section 3205 (c) ...The written elements of a COVID-19 Prevention Program shall include:**

## 2. Identifying and Evaluating COVID-19 Hazards

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(A) The employer shall allow for employee and authorized employee representative participation in the identification and evaluation of COVID-19 hazards.

### **SFSU Response**

Prior to workplace activities being permitted, the Budget & Logistics Committee reviewed written plans for the activity and personnel involved submitted by the area managers and employees.

Prior to gaining permission to return to work on campus, employees and their managers identified and evaluated the hazards surrounding their return to campus.

Employees can report any unsafe practice or condition to EH&S using the SFSU EH&S phone app. Specific COVID hazards should be brought to the attention of the Budget & Logistics Committee for evaluation and control.

Employees and their representatives can also participate in the identification and evaluation of COVID hazards through the campus safety committee's meetings.

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(B) The employer shall develop and implement a process for screening employees for and responding to employees with COVID-19 symptoms. The employer may ask employees to evaluate their own symptoms before reporting to work. If the employer conducts screening at the workplace, the employer shall ensure that face coverings are used during screening by both screeners and employees and, if temperatures are measured, that non-contact thermometers are used.

### **SFSU Response**

Employee are required to report any symptoms on the SFSU COVID self-health check phone app before coming to campus each day. The phone app will assess their reported symptoms and allow or deny access to the campus. Building Ambassadors wearing face coverings check the status of the phone app before allowing anyone into a campus building.

This information was communicated by on-line *Working Safely at SFSU During the COVID-19 Pandemic* training required of all employees and students coming to campus.

Employees and students can also report COVID symptoms and test results by emailing [covid19@sfsu.edu](mailto:covid19@sfsu.edu) or using the [COVID-19 NOTIFICATION](#) link on the University's [SF News and Campus Plan for COVID](#) web page:

At specific locations such as the childcare centers, where non-contact temperature testing takes place, face coverings are required by both screeners and parents while dropping off and picking up children.

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(C) The employer shall develop COVID-19 policies and procedures to respond effectively and immediately to individuals at the workplace who are a COVID-19 case to prevent or reduce the risk of transmission of COVID-19 in the workplace.

### **SFSU Response**

COVID-19 policies and procedures are available on the SFSU COVID-19 website. Persons developing symptoms while on campus are expected to report their symptoms via email at [covid19@sfsu.edu](mailto:covid19@sfsu.edu) or use the [COVID-19 Notification](#) form on the University's [SF News and Campus Plan for COVID](#) web page.

Depending on their symptoms, an employee either will be directed to return home and contact their primary care provider or should be transported for emergency care.

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(D) In accordance with subsection (c)(3)(B)3, communicate information about COVID-19 hazards and the employer's COVID-19 policies and procedures to employees and to other employers, persons, and entities within or in contact with the employer's workplace.

1. This shall 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.

2. This shall 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. Employers shall consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

### **SFSU Response**

Face to face meetings are to be avoided whenever possible. When in-person meetings are necessary, face coverings or N-95 respirators and social distancing of 6 feet or more are required, as signage indicates all over the campus.

On those rare occasions when persons are required to work closer than 6 feet from each other, they are all required to wear N-95 respirators.

Anyone seeking to enter a campus building must demonstrate to the Building Ambassador stationed at the building entrance that they have performed and passed a set of COVID health screening questions. This applies to contractors and other persons who do not have access to the SFSU self-health check phone app.

For their assessment, the health check questions are available in multiple languages in hard copy at building entrances.



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(E) For indoor locations, the employer shall evaluate how to maximize the quantity of outdoor air and whether it is possible to increase filtration efficiency to the highest level compatible with the existing ventilation system.

**SFSU Response**

The SFSU Facilities HVAC group has upgraded building ventilation air filters to near HEPA quality MERV-13, the highest MERV-rated air filters compatible with the existing ventilation systems.

The balance of outdoor vs recirculated air is monitored to maximize outdoor air. Severe wildfire smoke levels may require rebalancing of outdoor vs recirculated air.

Note: Recirculated air goes through the MERV -13 filters before re-entering the building's air supply.

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(F) The employer shall 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 employer's industry, location, and operations.

**SFSU Response**

Several SFSU departments are responsible for monitoring applicable COVID guidance from the CDC, State of California, and local health Departments. These include, but are not limited to:

- EH&S - for all regulatory updates
- Student Health Services - for medically relevant information,
- Risk Management/Workers Compensation - for OSHA log and WC case reporting,

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(G) The employer shall evaluate existing COVID-19 prevention controls at the workplace and the need for different or additional controls. This includes evaluation of controls in subsections (c)(4), and (c)(6) through (c)(8).

**SFSU Response**

The Budget & Logistics Committee is responsible for the operation of the campus under COVID. They assess, define, and implement the COVID prevention controls needed for the University on an ongoing basis.

This includes oversight of issues discovered by the COVID inspection program.

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(H) The employer shall 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.

**SFSU Response**

Building Ambassadors inspect building entrants for compliance with having completed their COVID health-screening questionnaire. The COVID inspection program created a paper-based checklist to inspect occupied areas of the campus. An on-line Qualtrics version is being developed.

EHS Staff identifies COVID issues while distributing PPE and other safety supplies across campus, and while inspecting operating labs in COSE.

**Cal/OSHA Title 8 Section 3205 (c) ...The written elements of a COVID-19 Prevention Program shall include:**

**3. Investigating and Responding to COVID-19 cases in the workplace**

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(A) Employers shall have an effective procedure to investigate COVID-19 cases in the workplace. This includes procedures for verifying COVID-19 case status, receiving information regarding COVID-19 test results and onset of COVID-19 symptoms, and identifying and recording COVID-19 cases.

**SFSU Response**

Upon receipt of a COVID-19 positive test result or report of a close contact, a member of SF State's Contact Tracing Support Team (CTST) reaches out to the employee by telephone and completes a detailed questionnaire regarding testing, onset of symptoms, last day worked, potential close contacts, etc.

If the employee confirms a positive test result for COVID-19, the CTST lead contacts HR to initiate the campus workplace notification process. The CTST member then consults with the employee's manager to further identify and or confirm potential close contacts and affirm strict adherence to COVID-19 mitigation measures.

The CTST lead consults with the San Francisco Department of Public Health (SFDPH) on appropriate next steps with regard to quarantining, self-isolating and determination of close contacts. If other employees are determined to have been close contacts, a member of the CTST reaches out to each employee by telephone to establish if they indeed were a close contact, refers them to be tested, directs the employee to quarantine and encourages employee to primary care provider.

Once all potential close contacts have been contacted, the CTST lead may again consult with SFDPH and then meets with the employee's manager(s) to review proper enforcement of COVID-19 mitigation measures and, in some cases, makes site visits to the workplace and or offers COVID-19 prevention training to co-workers.

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(B) The employer shall take the following actions when there has been a COVID-19 case at the place of employment:

1. 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 were experienced.

2. Determine who may have had a COVID-19 exposure. This requires 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 high-risk exposure period.

Note: See subsection (c)(10) for exclusion requirements for employees with COVID-19 exposure.

3. 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:

a. All employees who may have had COVID-19 exposure and their authorized representatives.

b. Independent contractors and other employers present at the workplace during the high-risk exposure period.

4. Offer COVID-19 testing at no cost to employees during their working hours to all employees who had potential COVID-19 exposure in the workplace and provide them with the information on benefits described in subsections (c)(5)(B) and (c)(10)(C).

5. Investigate whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure to COVID-19 hazards.

**SFSU Response: (Also see (c)(3)(A) above.)**

SFSU sends an email, "Notification of Potential Workplace Exposure to COVID-19" to all employees identifying new case information without personal information within 24 hours. Project managers forward a copy of the message to any contractors they have who may have been working on campus.

Some no cost testing is available on campus. When on-campus testing is not available, employees may be sent during work hours for testing (at no charge to the employee) to local testing facilities.

The Budget & Logistics Committee considers whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure to COVID-19 hazards.

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(C) Personal identifying information of COVID-19 cases or persons with COVID-19 symptoms shall be kept confidential. All COVID-19 testing or related medical services provided by the employer under this section and sections 3205.1 through 3205.4 shall be provided in a manner that ensures the confidentiality of employees. EXCEPTION to subsection (c)(3)(C): Unredacted information on COVID-19 cases shall be provided to the local health department, CDPH, the Division, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law immediately upon request.

**SFSU Response**

Confidentiality is discussed in the University's [Coronavirus Managers and Staff FAQ](#) document maintained by Human Resources.

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(D) The employer shall ensure that all employee medical records required by this section and sections 3205.1 through 3205.4 are kept confidential and are not disclosed or reported without the employee's express written consent to any person within or outside the workplace.

EXCEPTION 1 to subsection (c)(3)(D): Unredacted medical records shall be provided to the local health department, CDPH, the Division, NIOSH, or as otherwise required by law immediately upon request.

EXCEPTION 2 to subsection (c)(3)(D): This provision does not apply to records that do not contain individually identifiable medical information or from which individually identifiable medical information has been removed.

**SFSU Response**

Confidentiality is discussed in the University's [Coronavirus Managers and Staff FAQ](#) document available on the Human Resources website.

(4) Correction of COVID-19 hazards. Employers shall implement effective 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. This includes, but is not limited to, implementing controls and/or policies and procedures in response to the evaluations conducted under subsections (c)(2) and (c)(3) and implementing the controls required by subsection (c)(6) through (c)(8).

### **SFSU Response**

Issues identified by the SFSU COVID Inspection program inspectors are discussed with affected employees, and reported to the area supervisor. Issues that re-occur are forwarded to the Budget & Logistics Committee for action and tracking to final resolution.

Behavioral non-compliance issues are directed to the appropriate organization based on the status of the offender: Employees – HR/Labor Relations; Faculty – Faculty Senate; Students – Student Affairs.

Issues may also be brought to the EH&S department x82596, or raised with any member of the Budget & Logistics Committee.

**Cal/OSHA Title 8 Section 3205 (c) ...The written elements of a COVID-19 Prevention Program shall include:**

(5) Training and instruction. The employer shall provide effective training and instruction to employees that includes the following:

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(A) The employer's COVID-19 policies and procedures to protect employees from COVID-19 hazards.

**SFSU Response**

Employees are required to complete the on-line *Working Safely at SFSU During the COVID-19 Pandemic* training course before doing any work on campus property.

Employees may view SF State Campus Plan for COVID-19 on the [SF News and Campus Plan for COVID](#) webpage

Additional COVID information is available on the [HR COVID website](#):



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(B) 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.

### **SFSU Response**

SF State employees may be entitled to various benefits under applicable federal and state laws and university-specific policies and agreements, including but not necessarily limited to, the following:

- Family Medical Leave Act/California Family Rights Act Leave -
- Leave Benefits Pursuant to the applicable Collective Bargaining Agreements and any applicable negotiated MOUs
- University [Sick Leave](#):

Workers Compensation: If you believe you contracted a COVID-19 related illness as a result of your employment, you may be entitled to workers' compensation benefits. This may include hospital, surgical, and medical treatment, disability indemnity, and death benefits. To file a workers compensation claim, please notify your employer that you believe your COVID-19 related illness is work-related and file a DWC-1 Claim Form pursuant to Labor Code Section 5401.

SFSU benefits programs and policies are also posted on the following campus websites:

- [HR Benefits](#)
- [HR COVID](#)

If you believe you are being harassed or retaliated against, please review the CSU Executive Order 1096: Systemwide Policy Prohibiting Discrimination, Harassment, Retaliation, Sexual Misconduct, Dating and Domestic Violence, and Stalking against Employees and Third Parties and Systemwide Procedure for Addressing Such Complaints by Employees and Third Parties. (Revised 8/14/2020).

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(C) 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.

**SFSU Response**

This topic is covered in the required on-line *Working Safely at SFSU During the COVID-19 Pandemic* course.

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(D) Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.

**SFSU Response**

This topic is covered in the required on-line *Working Safely at SFSU During the COVID-19 Pandemic* course.

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(E) 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.

**SFSU Response**

This topic is covered in the required on-line *Working Safely at SFSU During the COVID-19 Pandemic* course.

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(F) 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.

**SFSU Response**

This topic is covered in the required on-line *Working Safely at SFSU During the COVID-19 Pandemic* course.

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(G) Proper use of face coverings and the fact that face coverings are not respiratory protective equipment.

**SFSU Response**

This topic is covered in the required on-line *Working Safely at SFSU During the COVID-19 Pandemic* course.

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

**SFSU Response:**

This topic is covered in the required on-line *Working Safely at SFSU During the COVID-19 Pandemic* course.

**Cal/OSHA Title 8 Section 3205 (c) ...The written elements of a COVID-19 Prevention Program shall include:**

**(6) Physical distancing.**

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(A) All employees shall be separated from other persons by at least six feet, except where an employer can demonstrate that six feet of separation is not possible, 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 visitors; visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel; staggered arrival, departure, work, and break times; and adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.

**SFSU Response**

These measures have been adopted and are available on the [COVID Safety and Welfare Strategies](#) web page.

They are also demonstrated in the on-line *Working Safely at SFSU During the COVID-19 Pandemic* training required of all employees and students coming to campus.

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

**SFSU Response**

Employees are not to work within 6 feet of each other unless the task requires it.

When employees must work within 6 feet of each other because the task requires it, they are required to wear N-95 respirators.

This topic is covered in the required on-line *Working Safely at SFSU During the COVID-19 Pandemic* course required of all employees before coming on campus.

**Cal/OSHA Title 8 Section 3205 (c) ...The written elements of a COVID-19 Prevention Program shall include:**

**(7) Face coverings.**

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(A) Employers shall provide face coverings and ensure they are worn by employees over the nose and mouth when indoors, when outdoors and less than six feet away from another person, and where required by orders from the CDPH or local health department. Employers shall ensure face coverings are clean and undamaged. 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. While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
3. Employees wearing respiratory protection in accordance with section 5144 or other title 8 safety orders.
4. Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person.
5. Specific tasks which cannot feasibly be performed with a face covering. This exception is limited to the time period in which such tasks are actually being performed, and the unmasked employee shall be at least six feet away from all other persons unless unmasked employees are tested at least twice weekly for COVID-19.

NOTE: CDPH has issued guidance for employers that identifies examples when wearing a face covering is likely not feasible.

**SFSU Response**

SFSU provides face coverings and N-95 respirators free of charge as needed, and follows the requirements above, with one exception: Employees are not permitted to eat indoors in the presence of others.

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(B) Employees exempted from wearing face coverings due to a medical condition, mental health condition, or disability shall wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits it.

**SFSU Response**

For individuals with medical documentations stating they cannot wear a face covering, the University will meet with them to discuss reasonable accommodations through the interactive process, in order to protect the health and safety of the campus community. Individuals requiring this exemption should contact the Disability Programs & Resource Center (DPRC) to review potential accommodations. Individuals who decline to wear a face covering and have not been provided accommodation documentation by DPRC will be asked not to enter campus buildings. If a service can be provided to an individual without a face covering outside the building, the University will endeavor to accommodate when possible and safe.

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(C) Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall 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.

**SFSU Response**

All employees must wear face coverings when on campus unless they have an exemption from a healthcare provider based on disability, medical condition, or other condition that prevents them from wearing a face covering.

Testing is unacceptable as a reason for not wearing a face covering on campus.

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(D) No employer shall prevent any employee 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.

**SFSU Response**

SFSU allows the wearing of face coverings for the comfort of the wearer unless it creates a safety hazard.

An exception would be wearing a face covering under a required respirator which would prevent a proper seal

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(E) Employers shall implement measures to communicate to non-employees the face coverings requirements on their premises.

**SFSU Response**

There are signs on doors, walls, and floors. SFSU follows SF County requirements. Project managers discuss these requirements with contractors they are hiring.

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(F) The employer shall develop COVID-19 policies and procedures to minimize employee exposure to COVID-19 hazards originating from any person not wearing a face covering, including a member of the public.

**SFSU Response**

Members of the public are not allowed in campus buildings except in certain buildings that have public areas.

Public areas have barriers in place to protect staff at: information counters, Bursar's windows, etc.

Disciplinary measures are in place for students, staff, and faculty found to be violating COVID safety and health policies and practices.

**Cal/OSHA Title 8 Section 3205 (c) ...The written elements of a COVID-19 Prevention Program shall include:**

(8) Other engineering controls, administrative controls, and personal protective equipment.

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(A) At fixed work locations where it is not possible to maintain the physical distancing requirement at all times, the employer shall install cleanable solid partitions that effectively reduce aerosol transmission between the employee and other persons.

**SFSU Response**

Cleanable partitions are present where it is not possible to maintain the physical distancing requirement at all times - For instance in the Bursars office. Contact Michael Scott of the Budget & Logistics Committee or Jeff Madigan of EH&S to obtain additional partitions.

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(B) For buildings with mechanical or natural ventilation, or both, employers shall 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.

**SFSU Response**

The SFSU Facilities HVAC group has upgraded building ventilation air filters to near HEPA quality MERV-13, the highest MERV-rated air filters compatible with the existing ventilation systems.

The balance of outdoor vs recirculated air is monitored to maximize outdoor air. Severe wildfire smoke levels may require rebalancing of outdoor vs recirculated air.

Note: Recirculated air goes through the MERV -13 filters before re-entering the building's air supply.



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(C) Employers shall 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 shall 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 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 by different people. Sharing of vehicles shall be minimized to the extent feasible, and high touch points (steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) shall be disinfected between users.
3. Cleaning and disinfection of areas, material, 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. See Group 2 and Group 16 of the General Industry Safety Orders for further information.

### **SFSU Response**

Facilities Services has identified frequently touched surfaces for enhanced cleaning, their cleaning protocols, and cleaning frequency in the attached chart that will be posted as part of this COVID-IIPP.

SFSU custodial operations are using several cleaning and disinfecting methods:

Manual enhanced surface and space spray bottle cleaning using reliable Brand (EPA reg: 6836-165), PROTEXUS Electrostatic fogger units using PURTABS (EPA reg: 71847-6), Kaivac no touch cleaning units for bathrooms using VIREX II (EPA reg: 70627-24) and KaiBosh (EPA reg: 10324-93).

For large areas (auditoriums etc.) we employ the CLOROX Total 360 cleaning system.

Buildings/areas are systematically cleaned by overstaffing in-house personnel and assigning them to specific buildings based directly on: class schedule (cleaning and letting sit 1 hour between classes), research activity and administrative functions.

SFSU prohibits the sharing of PPE and provides face coverings free of charge as needed. Lab coats and safety glasses are required in labs. Gloves are available as needed in labs. Disinfectants and cleaning supplies are available upon request to the Logistics section of the Budget & Logistics Committee for users to disinfect frequently used items and equipment.

Facilities Services procedures for cleaning and disinfecting. "areas, material, and equipment used by a COVID-19 case during the high-risk exposure period" are as follows: The SFSU custodial operations uses Electrostatic foggers (NOT sprayers) by Evaclean with PURTABS (EPA reg: 71847-6-91524) for space disinfection. The disinfectant is made to be used exclusively with the PX200ES Protexus electrostatic fogger unit. For large areas (auditoriums etc.), we employ the CLOROX Total 360 cleaning system.

All employees engaged in the cleaning process are wearing proper PPE.

Frequently Touched Surfaces and Objects	Cleaning/Disinfecting Protocol Used	Frequency of Cleaning/Disinfecting
Doorknobs	Spray / Wiping	2-3 times daily
Bannisters & Railings	Spray / Wiping	2-3 times daily
Elevator Buttons	Spray / Wiping	2-3 times daily
Bathroom Surfaces	Spray / Wiping	2-3 times daily
Steering Wheels	Spray / Wiping	Before / After Use
Classroom Chairs	Spray / Wiping	Before / After Use
Classroom Desks	Spray / Wiping	Before / After Use
Classroom Surfaces	Spray / Wiping	Before / After Use
Break Rooms	Spray / Wiping	Before / After Use
Reception Areas	Spray / Wiping	Before / After Use

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(D) To protect employees from COVID-19 hazards, the employer shall evaluate its handwashing facilities, determine the need for additional facilities, encourage and allow time for employee handwashing, and provide employees with an effective hand sanitizer. Employers shall encourage employees to wash their hands for at least 20 seconds each time. Provision or use of hand sanitizers with methyl alcohol is prohibited.

**SFSU Response**

Handwashing facilities are available throughout the campus in bathrooms and laboratories.

Hand sanitizing stations are in every building, and personal hand sanitizer bottles are provided and replenished wherever needed.

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(E) Personal protective equipment.

1. Employers shall 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.
2. Employers shall evaluate the need for respiratory protection in accordance with section 5144 when the physical distancing requirements in subsection (c)(6) are not feasible or are not maintained.
3. Employers shall provide and ensure use of respirators in accordance with section 5144 when deemed necessary by the Division through the Issuance of Order to Take Special Action, in accordance with title 8 section 332.3.
4. Employers shall provide and ensure use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract.

**SFSU Response**

The Budget & Logistics committee working with EH&S and the Procurement department has evaluated the University's PPE needs, and specifies, procures and distributes necessary COVID supplies on an ongoing basis.

SFSU has an ongoing Respiratory Protection Program in compliance with section 5144.

SFSU policy requires the use of N-95 respirators whenever social distancing is not possible due to the nature of the work being performed.

Eye protection is required for entry into laboratories.

PPE is not to be shared.

The B&L Committee actively procures enough cryo gloves, heat gloves, face shields, and any other usually shared PPE to eliminate the need to share. Should there be a temporary shortage of specialty gloves, they may be safely shared by double gloving, i.e. wearing a second lighter glove inside the specialty glove.

Laboratory visitor glasses must be single-use or sanitized before and after uses.

**Cal/OSHA Title 8 Section 3205 (c) ...The written elements of a COVID-19 Prevention Program shall include:**

**(9) Reporting, recordkeeping, and access.**

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(A) The employer shall report information about COVID-19 cases at the workplace to the local health department whenever required by law, and shall provide any related information requested by the local health department.

**SFSU Response**

Student Health Services is the University's designated point of contact with local health departments and is responsible for reporting COVID cases.

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(B) The employer shall report immediately to the Division any COVID-19-related serious illnesses or death, as defined under section 330(h), of an employee occurring in a place of employment or in connection with any employment.

**SFSU Response**

Reporting serious illness or death to the EHS Director within 8 hours is required in the IIPP and EAP training that employees take.

The SFSU EH&S Director is responsible for reporting COVID-19-related serious illnesses or death to CalOSHA. The workers comp manager is his backup.

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(C) The employer shall maintain records of the steps taken to implement the written COVID-19 Prevention Program in accordance with section 3203(b).

**SFSU Response**

Since COVID Health and Safety training was delivered by an on-line *Working Safely at SFSU During the COVID-19 Pandemic* training course in CSU-Learn, records of who was trained are downloadable.

COVID inspection findings will be tracked on paper forms until we are able to go paperless with a Qualtrics form.

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(D) The written COVID-19 Prevention Program shall be made available at the workplace to employees, authorized employee representatives, and to representatives of the Division immediately upon request.

**SFSU Response**

When completed, this COVID IIPP will be posted on the EHS webpage available to all. It will be a working copy to allow the University to respond to changes in the pandemic, regulatory requirements and best practices.

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(E) The employer shall 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 shall be kept confidential in accordance with subsections (c)(3)(C) and (c)(3)(D). The information shall be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

Note: Subsection (c)(9)(E) 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.

**SFSU Response**

Employees are to report COVID cases using the [covid19@sfsu.edu](mailto:covid19@sfsu.edu) or the on-line Qualtrics tool on the University's SF News and Campus Plan for COVID-19 website: <https://news.sfsu.edu/campus-plan>

Click on the COVID-19 Notification box at the bottom of the page to access the online [COVID-19 Notification Form](#)

A "Notification of Potential Workplace Exposure to COVID-19" email, stripped of personal information, is emailed to all employees within 24 hours of a new case.

**Cal/OSHA Title 8 Section 3205 (c) ...The written elements of a COVID-19 Prevention Program shall include:**

(10) Exclusion of COVID-19 cases. The purpose of this subsection is to limit transmission of COVID-19 in the workplace.

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(A) Employers shall ensure that COVID-19 cases are excluded from the workplace until the return to work requirements of subsection (c)(11) are met.

**SFSU Response**

SFSU policy excludes COVID cases from the workplace until return to work requirements are met. This is covered in the required on-line *Working Safely at SFSU During the COVID-19 Pandemic* training program. See also subsection (c)(11).

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(B) Employers shall exclude employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.

**SFSU Response**

SFSU policy is consistent with these return to work requirements.

Employees are excluded by the Self-Screening app.

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(C) For employees excluded from work under subsection (c)(10) and otherwise able and available to work, employers shall 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. Employers 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.

EXCEPTION 1: Subsection (c)(10)(C) 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.

EXCEPTION 2: Subsection (c)(10)(C) does not apply where the employer demonstrates that the COVID-19 exposure is not work related.

**SFSU Response**

SFSU complies with these requirements. Information on COVID-related pay is available on the [HR COVID website](#) and at the [HR COVID-19 FAQ](#) page

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(D) Subsection (c)(10) does not limit any other applicable law, employer policy, or collective bargaining agreement that provides for greater protections.

**SFSU Response**

Statement of fact. Does not require a response.

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(E) At the time of exclusion, the employer shall provide the employee the information on benefits described in subsections (c)(5)(B) and (c)(10)(C).

**SFSU Response**

SFSU complies with these requirements. See subsections (c)(5)(B) and (c)(10)(C) for details. Contact HR with questions about these benefits.



**Cal/OSHA Title 8 Section 3205 (c) ...The written elements of a COVID-19 Prevention Program shall include:**

**(11) Return to work criteria.**

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(A) COVID-19 cases with COVID-19 symptoms shall not return to work until:

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

**SFSU Response**

SFSU policy is consistent with these return to work requirements.

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(B) 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.

**SFSU Response**

SFSU policy is consistent with these return to work requirements.

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(C) A negative COVID-19 test shall not be required for an employee to return to work.

**SFSU Response**

SFSU policy is consistent with these return to work requirements.

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(D) If an order to isolate or quarantine an employee is issued by a local or state health official, the employee shall 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 shall be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.

**SFSU Response**

SFSU policy is consistent with these return to work requirements.

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(E) If there are no violations of local or state health officer orders for isolation or quarantine, the Division 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 shall 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.

**SFSU Response**

SFSU would use on-campus isolation capabilities to address the unlikely circumstances described. The employee would not be allowed to return to on-campus work duties