

# COVID-19 Prevention Program (CPP) for Johnson Service Group

This CPP is designed to control exposures to the SARS-CoV-2 virus that may occur in the clients workplace/worksites.

**Date: 11/30/20**

## Authority and Responsibility

Greg Thullner, COO has overall authority and responsibility for implementing the provisions of this CPP in the clients workplace/worksites. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

All employees are responsible for using safe work practices, following all directives, policies and procedures, and assisting in maintaining a safe work environment.

## Identification and Evaluation of COVID-19 Hazards

Where possible, JSG will work with the client to confirm the following is in place at the clients' workplace/worksites:

- Conduct (where applicable) and/or confirm that workplace/worksites-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form are completed. Should JSG not be able to conduct the evaluation in-person, JSG will work with the client to ensure the evaluation is completed and a copy of the evaluation is received.
- Confirm the client evaluates employees' potential workplace/worksites exposures to all persons at, or who may enter, the clients workplace/worksites.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention and where applicable, work with the client to ensure they are made aware of any updates to said guidance and offer any assistance to ensure compliance for JSG employees/contractors.
- Check to ensure the client is evaluating their existing COVID-19 prevention controls in the workplace/worksites and that they address the need for different or additional controls.
- Conduct periodic inspections using the **Appendix B: COVID-19 Inspection form** as needed (and where applicable) to assist the client to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with all applicable COVID-19 policies and procedures when the client will allow for this.
- JSG will confirm the client provides Safe Workplace training to all JSG employees to complete. If not, JSG will provide Safe Workplace training to all employees.
- JSG will confirm with the client they are ensuring a safe work environment is provided for all employees.

## Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by reporting any unsafe work condition to their JSG representative or the JSG Safety Team at (888) 659-8388 or [Safety@JSGINC.com](mailto:Safety@JSGINC.com). Employees can also request a copy of the template of the COVID-19 Inspection Form from the Safety Team for reference or download the template off the company website at <https://www.JSGINC.com>.

## Employee screening

All employees are instructed to adhere to their assigned clients Response Plan for COVID-19. JSG will confirm with the assigned client that they are screening employees prior to entering or re-entering the workplace/worksites according to CDPH guidelines. JSG will confirm with the assigned client that should

a temperature screening be desired, an employee may request one from their site manager. Employees are also encouraged to stay home if they are ill.

## **Correction of COVID-19 Hazards**

JSG will document any and all unsafe or unhealthy work conditions, practices or procedures on the **Appendix B: COVID-19 Inspection** form, and will work with the client as much as possible to ensure that the issues are corrected in a timely manner based on the severity of the hazards, as follows:

1. JSG will cooperate with the client to ascertain and assess the severity of the hazard & ascertain the proper correction time frames.
2. JSG will partner with the client to ensure timely correction as the client allows.
3. The Account/Client Manager, the JSG Safety Team, & Executive Leadership will provide and ensure proper & timely follow-up to verify timely corrections are made by the client.

## **Control of COVID-19 Hazards**

### **Physical Distancing**

Where possible, JSG will confer and confirm with the client that they are ensuring at least six feet of physical distancing at all times in the workplace/worksites by:

- Conferring with the client on an as needed basis to determine the need for workers to be in the workplace/worksites – e.g., telework or other remote work arrangements (where applicable).
- Conferring with the client on the manner in which it plans to reduce the number of persons in an area at one time, including visitors (where applicable).
- Work with the client (to the extent allowed by the client) to determine and develop visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel (where applicable).
- Confer with client on whether staggered arrival, departure, work, and break times are viable and/or necessary.
- Please see section 3205(c)(6) for details

JSG will confer and make every effort to confirm that the client is ensuring individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

### **Face Coverings**

JSG will confirm with the client that employees are provided clean, undamaged face coverings and confirm the client is ensuring they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department. Should face coverings be unavailable at the job site, JSG will provide face coverings to its employees/contractors. JSG, either directly with its assigned employee/contractor or through working with the client, will ensure that should an employee require an additional face mask, employees only need to request one from their worksite manager or directly through JSG. Each employee is responsible for the cleaning of the face covering as required. JSG has communicated to each of its employees/contractors assigned at client sites that should an employee encounter any non-employees that are not wearing face coverings, this should be immediately reported to a manager/supervisor for correction.

JSG will confer and make every attempt to confirm with the client that the following are the only exceptions to the use of face coverings at their worksite:

- When an employee is alone in a room.
- While eating and drinking at the workplace/worksites, provided employees are at least six feet apart and outside air is supplied to the area, if indoors, outside air has been maximized to the extent

possible.

- 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. Alternatives will be considered on a case-by-case basis.

JSG, where applicable, and to every extent possible, will endeavor to confirm with the client that 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.

### **Engineering controls**

JSG will endeavor to confirm with the client that they implement the following measures for situations where employees cannot maintain at least six feet between individuals to rotate or move entire work stations and/or install solid partitions if necessary and where applicable.

JSG will endeavor to confirm with the client they ensure they maximize, to the extent feasible, the quantity of outside air for their buildings with mechanical or natural ventilation systems by confirming with the client that the ventilation system is properly maintained and adjusted. Please note, there are circumstances where the amount of outside air needs to be minimized due to other hazards, such as heat and wildfire smoke.

### **Cleaning and disinfecting**

JSG, to every extent possible, will endeavor to confirm with the client that they ensure the following cleaning and disinfection measures for frequently touched surfaces:

- JSG will endeavor to confirm the client's cleaning schedule and ensure one is in place.
- JSG will endeavor to ensure adequate cleaning supplies are provided and adequate time is allowed for cleaning to be done properly.
- JSG will endeavor to encourage the client to inform employees of the frequency and scope of cleaning and disinfection.

Should there be a COVID-19 case at a client workplace/worksites, JSG will endeavor to confirm the client implements a procedure of having an additional cleaning and disinfection performed, either by client staff or by an outside service, of the entire worksite and frequently touched areas as soon as possible during the high-risk exposure period.

### **Shared tools, equipment, and personal protective equipment (PPE)**

PPE must not be shared, e.g., gloves, goggles, and face shields.

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments, and tools must also not be shared, to the extent feasible. If any item must be shared, the item must be disinfected between uses by wiping down the item with the client provided cleaning products. Should an employee require any assistance or training with this process, they are to contact on-site manager or immediate supervisor, and contact their JSG representative to ensure it is provided to them.

### **Hand sanitizing**

In order to implement effective hand sanitizing procedures, JSG will, to every extent possible, endeavor to confirm with the client:

- Client has evaluated available handwashing facilities in all branches.
- Client highly encourages and allows time for employee handwashing.
- Client provides employees with an effective hand sanitizer, and prohibits hand sanitizers that contain methanol (i.e. methyl alcohol).
- Client encourages employees to wash their hands for at least 20 seconds each time.

## **Personal protective equipment (PPE) used to control employees' exposure to COVID-19**

JSG will endeavor to confirm the client evaluates the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, and confirm such PPE is provided by the client as needed.

When it comes to respiratory protection, JSG will endeavor to confirm the client evaluates the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained. Please see section 3205(c)(E) for details on required respirator and eye protection use.

## **Investigating and Responding to COVID-19 Cases**

This will be accomplished by using the **Appendix C: Investigating COVID-19 Cases** form.

JSG will endeavor to confirm with the client that employees who had potential COVID-19 exposure at the client worksite will be:

- Offered COVID-19 testing at no cost during their working hours.
- Provided information on benefits described in any Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to them via e-mail upon request from the Human Resources (HR) team.

## **System for Communicating**

JSG will endeavor to confirm the client has an effective two-way communication with JSG employees, in a form they can readily understand, and that it includes the following information:

- Who employees should report COVID-19 symptoms and possible hazards to, and how. This is reviewed with employees upon their start either verbally, or via e-mail. Employees also sign a document upon start up that should they need to call in regarding COVID-19 to contact their JSG representative.
- That employees can report symptoms and hazards without fear of reprisal.
- The client provided procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness upon request.
- Where testing is not required, employees can access COVID-19 testing via <https://covid19.ca.gov/get-tested/>. Should an employee require further assistance, they can contact the client on-site supervisor or the JSG Safety Team at (888) 659-8388 or [Safety@JSGINC.com](mailto:Safety@JSGINC.com).
- In the event the client is required to provide testing because of a workplace/worksite exposure or outbreak, JSG will endeavor to confirm the client plan and to every extent possible will assist to communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test via e-mail, phone call, and/or text message.
- Endeavor to confirm with the client that information about COVID-19 hazards employees (including other employers and individuals in contact at the clients' workplace/worksite) may be exposed to, what is being done to control those hazards, and the clients COVID-19 policies and procedures are available to JSG employees.
- JSG will utilize the Sense App should the need arise to also be able to communicate with employees via text message (where applicable).

## **Training and Instruction**

JSG will endeavor to confirm with the client to ensure effective training and instruction is provided that includes:

- The client COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
  - COVID-19 is an infectious disease that can be spread through the air.

- COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
- An infectious person may have no symptoms.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of facecoverings.
- 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.
- 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.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- Should a client not offer this training, JSG will provide the training to the employee.

**Appendix D: COVID-19 Training Roster** will be used to document this training and to every extent possible be requested from the client.

## Exclusion of COVID-19 Cases

Should the client have a COVID-19 case at a clients workplace/worksites, JSG will endeavor to confirm, to every extent possible the client is limiting transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace/worksites until return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace/worksites for 10-14 days after the last known COVID-19 exposure to a COVID-19 case.
- Contractors and/or temporary employees be allowed and provided any emergency related benefits in accordance with federal, state and local laws.
- Providing employees at the time of exclusion with information on available benefits.

## Reporting, Recordkeeping, and Access

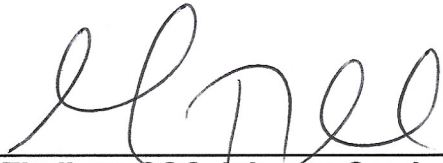
JSG, will endeavor to confirm with the client that they are:

- Reporting information about COVID-19 cases at their workplace/worksites to the local health department whenever required by law, and provide any related information requested by the local health department.
- Reporting immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in their place of employment or in connection with any employment.
- Maintaining records of the steps taken to implement their written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make their written COVID-19 Prevention Program available at the workplace/worksites to JSG Safety Team, employees (including JSG employees), authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use the **Appendix C: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19 cases. The information will be made available to the JSG Safety Team, all employees (including JSG employees), authorized employee representatives, or as otherwise required by law, with personal identifying information removed.
- The JSG Safety Team will create, maintain, and retain a file for all COVID-19 cases reported to them by the employee themselves or the client.

## Return-to-Work Criteria

JSG will endeavor to confirm the client adheres to the following for all employees:

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
    - 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.
    - 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 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 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.
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Greg Thullner, COO Johnson Service Group



DATE

## Appendix A: Identification of COVID-19 Hazards

All persons, regardless of symptoms or negative COVID-19 test results, will be considered potentially infectious. Particular attention will be paid to areas where people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not. For example: meetings, entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

Evaluation of potential client workplace/worksites exposure will be to all persons at the workplace/worksites or who may enter the client workplace/worksites, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. The client will consider how employees and other persons enter, leave, and travel through the workplace/worksites, in addition to addressing fixed work locations.

**Person conducting the evaluation:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Name(s) of employee and authorized employee representative that participated:**

\_\_\_\_\_

Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards	Places and times	Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers	Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation

<b>Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards</b>	<b>Places and times</b>	<b>Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers</b>	<b>Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation</b>



## Appendix B: COVID-19 Inspections

Date: \_\_\_\_\_

Name of person conducting the inspection: \_\_\_\_\_

Work location evaluated: \_\_\_\_\_

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Signage, floor markings, colored tape, etc.			
Cubicles, Offices, Conference/meeting room, & common areas arranged for proper physical distancing			
<b>Administrative</b>			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies, outside service)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
Workers encouraged if they are sick or exhibiting symptoms of COVID-19 to stay home			
Training Available, Provided, & Documented			
<b>PPE (not shared, available and being worn)</b>			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
Symptom screenings and/or temperature checks			
Signage about frequent handwashing and use of hand sanitizer			

## Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 testing or related medical services provided by the client will be provided in a manner that ensures the confidentiality of employees, with the exception of unredacted information on COVID-19 cases that will be provided immediately upon request to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law.

All employees' medical records will also be kept confidential and not disclosed or reported without the employee's express written consent to any person within or outside the client workplace/worksites, with the following exceptions: (1) Unredacted medical records provided to the local health department, CDPH, Cal/OSHA, NIOSH, or as otherwise required by law immediately upon request; and (2) Records that do not contain individually identifiable medical information or from which individually identifiable medical information has been removed.

**Date:** \_\_\_\_\_

**Name of person conducting the investigation:** \_\_\_\_\_

<b>Employee (or non-employee*) name:</b>		<b>Occupation (if non-employee, why they were in the workplace/worksites):</b>	
<b>Location where employee worked (or non-employee was present in the workplace/worksites):</b>		<b>Date investigation was initiated:</b>	
<b>Was COVID-19 test offered?</b>		<b>Name(s) of staff involved in the investigation:</b>	
<b>Date and time the COVID-19 case was last present in the workplace/worksites:</b>		<b>Date of the positive or negative test and/or diagnosis:</b>	
<b>Date the case first had one or more COVID-19 symptoms:</b>		<b>Information received regarding COVID-19 test results and onset of symptoms (attach documentation):</b>	

**Results of the evaluation of the COVID-19 case and all locations at the workplace/worksites that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):**

<b>Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:</b>			
<b>All employees who may have had COVID-19 exposure and their authorized representatives.</b>	<b>Date:</b>		
	<b>Names of employees that were notified:</b>		
<b>Independent contractors and other employers present at the workplace/worksites during the high-risk exposure period.</b>	<b>Date:</b>		
	<b>Names of individuals that were notified:</b>		
<b>What were the workplace/worksites conditions that could have contributed to the risk of COVID-19 exposure?</b>		<b>What could be done to reduce exposure to COVID-19?</b>	
<b>Was local health department notified?</b>		<b>Date:</b>	

\*Should an employer and/or client be made aware of a non-employee infection source COVID-19 status.

**Appendix D: COVID-19 Training Roster**

Date: \_\_\_\_\_

Person that conducted the training: \_\_\_\_\_

Employee Name	Signature