

Emery USD COVID-19 Prevention Program (CPP)

With some exceptions, all employers and places of employment are required to establish and implement an effective written COVID-19 Prevention Program (CPP) pursuant to an Emergency Temporary Standard in place for COVID-19 (California Code of Regulations (CCR), Title 8, section [3205\(c\)](#)). Cal/OSHA has developed this model program to assist employers with creating their own unique CPP tailored to their workplace.

Employers are not required to use this program. Employers may create their own program or use another CCP template. Employers can also create a written CCP by incorporating elements of this program into their existing Injury and Illness Prevention Program (IIPP), if desired. Cal/OSHA encourages employers to engage with employees in the design, implementation and evolution of their COVID-19 Prevention Program.

Using this model alone does not ensure compliance with the emergency temporary standard. To use this model program effectively, the person(s) responsible for implementing the CPP should carefully review:

- All of the elements that may be required in the following CCR, Title 8 sections:
 - [3205, COVID-19 Prevention](#)
 - [3205.1, Multiple COVID-19 Infection and COVID-19 Outbreaks](#)
 - [3205.2, Major COVID-19 Outbreaks](#)
 - [3205.3, Prevention in Employer-Provided Housing](#)
 - [3205.4, COVID-19 Prevention in Employer-Provided Transportation to and from Work](#)
 - The four [Additional Considerations](#) provided at the end of this program to see if they are applicable to your workplace.
- The additional guidance materials available at www.dir.ca.gov/dosh/coronavirus/



November 2020

COVID-19 Prevention Program (CPP) for Emery Unified School District

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

Date: January 26, 2021

Authority and Responsibility

The Director of Maintenance and Operations has overall authority and responsibility for implementing the provisions of this CPP in our workplace. 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

We will implement the following in our workplace:

- Conduct workplace-specific evaluations using the Appendix A: Identification of COVID-19 Hazards form.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter our workplace.
- 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.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the Appendix B: COVID-19 Inspections form as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: Notify site administration who will enter the information on the Identification of COVID-19 Hazards Form (Appendix-A). The Form will then be shared with the Director of Maintenance and Operations and COVID-19 Safety Committee for further review.

We screen our employees by: After self screening prior to leaving home, employees, at specified entrance locations, are temperature checked using a self administered touchless thermometer. In addition, the employees will sign the EUSD COVID-19 Symptom Screening Form located at all specified entry points.

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented on the Appendix B: COVID-19 Inspections form, and corrected in a timely manner based on the severity of the hazards, as follows:

The severity of the hazard will be assessed via the bi-weekly COVID-19 Safety Committee or the Inspections by the Director of Maintenance and Operations as appropriate to need and location. Inspections and correction time frames will be assigned, accordingly.

Control of COVID-19 Hazards

Physical Distancing

Where possible, we ensure at least six feet of physical distancing at all times in our workplace by:

- 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.
- Designated lunch/break areas and restrooms when possible.
- Adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.
- Reference section 3205(c)(6) for details

Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

Face Coverings

We provide clean, undamaged face coverings and ensure 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.

The District will maintain a supply of cloth (washable) face masks, face shields and respiratory protection available for all staff for every day that they are required to report to school sites. Disposable masks will be provided in the event an individual does not have their washable or filtered mask. Individuals not wearing face coverings will be provided one.

The following are exceptions to the use of face coverings in our workplace:

- When an employee is alone in a room.
- 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.
- Employees wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- 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.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

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

We implement the following measures for situations where we cannot maintain at least six feet between individuals: This will be determined on a case by case basis, as needed, (e.g. installation of partitions, outside learning, etc.).

We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by:

Natural Ventilation is a reliable strategy for maintaining air quality - it entails simply opening of doors and windows to support a consistent flow of new, rather than recycled, air. To rely on natural ventilation this year will also mean that teachers and staff will be asked to make sure that windows are unobstructed and accessible, as they will need to be open as often as possible during this pandemic to maximize fresh air flow into classrooms and workspaces.

Mechanical Ventilation with Filtration - in common areas or classrooms where windows are not present or operable, we will use mechanical ventilation systems which mix indoor warm air with fresh air from outside to maintain a comfortable temperature. To improve the ventilation systems, the District employed the following measures:

- Adjusted equipment to provide the recommended four air changes per hour in most of our buildings
- Upgraded air filtration systems so that they can utilize MERV-13 filters (which collect greater amounts of particles, pollen, aerosols, and other impurities than the MERV-8 filters we currently use).

Supplemental Air Cleaning and Portable Air Purifiers

The District has purchased individual air purification systems for classrooms. These supplemental air cleaners contain high-efficiency particulate air filters (HEPA) along with bipolar ionization technology that can add another layer of defense against viral transmission within our learning spaces.

Cleaning and Disinfecting School Facilities

We implement the following cleaning and disinfection measures for frequently touched surfaces:

Custodial staff will regularly disinfect high-touch surfaces such as light switches, faucets, handrails, and doorknobs in the classrooms and common areas.

Cleaning Materials and Supplies

The District will use Vital-Oxide as its primary disinfectant. Vital-Oxide and the secondary disinfectants chosen by EUSD are registered with the Environmental Protection Agency (EPA). The District currently has ample stock of Vital-Oxide and secondary disinfectants.

In addition, the EUSD has procured electrostatic sprayers for the use by each of its custodial employees and trained staff in their use. Electrostatic spraying represents a new standard of infection control, and moving forward EUSD will employ this technology daily at all school sites.

Along with these measures, the District will purchase individual boxes of materials to minimize the use of shared items. These will include individual consumable resources (printables and workbooks), individually-assigned textbooks and supplies to allow for single use between cleanings, the sanitizing of the classroom-assigned recess equipment and of the designated recess and lunch areas, and when practicable, shifting to digital resources such as online libraries.

The custodial staff will close off the infected area to the public and wait for at least 24 hours before entering the space. Custodial staff has been trained on how to clean an area that has been exposed to COVID-19, and will be required to wear safety goggles, nitrile gloves, Tyvex suits, and N95 respirators. The affected space will then be cleaned given the descriptions detailed in the above section under Cleaning and Disinfecting of School Facilities.

Shared tools, equipment and personal protective equipment (PPE)

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

Daily cleaning and disinfecting shall be done by trained custodial personnel. For individual or personally used items, staff shall wipe down professional equipment, desks, chairs, and other items they touch with disinfectant after use. Disinfectants will be provided to all staff members. All items used in communal spaces, including but not limited to the copy machine, must be cleaned and disinfected by trained custodial personnel. Disinfectant, including but not limited to wipes, will be available in all communal spaces.

Hand sanitizing

In order to implement effective hand sanitizing procedures :

All individuals shall be required to wash their hands for a minimum of 20 seconds or use medically effective hand sanitizer upon entering district sites and every time a classroom is entered.

Every room with a sink shall be stocked with soap, hand sanitizer, and no touch hand drying equipment, which could include a paper towel dispenser.

Every classroom without a sink will be provided a portable handwashing station within close proximity.

Every classroom shall be provided hand sanitizer.

Non-classroom workspaces and common spaces shall be provided hand sanitizer.

Hand sanitizer or portable hand washing stations shall be provided at each ingress and egress point on a school campus.

All hand washing/hand sanitizing supplies noted above or otherwise provided shall be checked and restocked immediately as needed and prior to the beginning of each day that staff or students are on campus. A service log will be posted and updated upon checks and restocks.

As part of these efforts, the maintenance department:

- Installed wall-mounted touchless hand sanitizer dispensers in all classrooms across the district, in school offices and the common areas, such as break rooms.

- Installed paper towels and soap dispensers in all classrooms to facilitate handwashing.
- Disabled all automatic hand dryers to prevent use in all restrooms district-wide, as they may facilitate the spread of COVID-19 virus.

The District will utilize a “Consumables Supply Log” which will be completed daily by custodial staff at all sink locations to ensure adequate supply of consumables. Protocols for handwashing will be sent home prior to the resumption of in-person instruction and will also be reviewed with students upon return to campus. Ongoing reminders and messaging will be shared with students and parents via social media platforms, site websites, and regular site-based announcements. EUSD leadership will work with the district nurse and campus health center to educate students about the importance of handwashing both prior to the reopening and once the learning resumes on campus.

Personal protective equipment (PPE) used to control employees’ exposure to COVID-19

We evaluate the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, and provide such PPE as needed.

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained.

Investigating and Responding to COVID-19 Cases

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

Employees who had potential COVID-19 exposure in our workplace will be:

- SSLs will track and report positive COVID-19 cases to the COVID Liaison (CL),
- The school nurse. This will trigger the CL’s reporting of the positive case(s) to the Superintendent and to the Alameda County Public Health Department (ACPHD). The CL will notify ACPHD via email or phone:
 - Email: safelearning@acgov.org
 - Phone: 510-268-2101
- School Site Liaisons will provide COVID Liaison with a list of the names and phone numbers of Close Contact within the campus (ACPHD will conduct contact tracing of contacts outside of the district.)
- The COVID Liaison will complete the Initial Case Investigation with the individual who tested positive and will fill out the relevant documents, such as the *COVID-19 Safelearning Case and Contact Reporting Form*.
- The confirmation of positive cases will be completed within 24 hours of a positive COVID case report.
- The COVID Liaison will follow an internal notification protocol for positive case reporting. Staff and a student’s family, the school site, and the district will be informed using relevant protocols.
- The CL will determine the dates for the quarantine period for the Close Contact (a 14 days period after the date of the last exposure).
- Within 48 hours of a positive case report, the School Site Liaison will send an exposure letter to staff and families; the letter will include the beginning and ending dates for the quarantine.

The District will implement COVID-19 testing at no cost to staff. The test will be administered twice monthly, on site testing and once monthly using an at home testing kit.

The notification to staff who have been exposed to COVID-19 will contain medical leave information.

System for Communicating

Our goal is to ensure that we have effective two-way communication with our 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:
- That employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Where testing is not required, how employees can access COVID-19 testing
- In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test.
- Information about COVID-19 hazards employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures per AB685.

Training and Instruction

We will provide effective training and instruction that includes:

- Our 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 face coverings.
- 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.

Appendix D: COVID-19 Training Roster will be used to document this training.

Exclusion of COVID-19 Cases

Where we have a COVID-19 case in our workplace, we will limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished by following all applicable state and federal laws.
- Providing employees at the time of exclusion with information on available benefits.

Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report 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 our place of employment or in connection with any employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to 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 employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

Return-to-Work Criteria

- 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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Dr. Quiana Scott, Superintendent Emery USD

January 26, 2021

Appendix B: COVID-19 Inspections

Date: January 26, 2021

Name of person conducting the inspection: Director of Maintenance and Operations

Work location evaluated: All Emery USD locations.

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Administrative			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
PPE (not shared, available and being worn)			
Face coverings (cloth and disposable masks)			
Gloves			
Face shields/goggles			
Respiratory protection (N95 or KN95 masks)			

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 us 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 workplace, 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: January 26, 2021

Name of person conducting the investigation: District COVID-19 liaison

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

Results of the evaluation of the COVID-19 case and all locations at the workplace 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):

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:			
All employees who may have had COVID-19 exposure and their authorized representatives.	Date:		
	Names of employees that were notified:		
Independent contractors and other employers present at the workplace during the high-risk exposure period.	Date:		
	Names of individuals that were notified:		
What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?		What could be done to reduce exposure to COVID-19?	
Was local health department notified?		Date:	

*Should an employer be made aware of a non-employee infection source COVID-19 status.

Appendix D: COVID-19 Training Roster

Date: January 26, 2021

Person that conducted the training: Human Resources Director and/or Director of Maintenance & Operations

Employee Name	Signature

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

[This section will need to be added to your CPP if your workplace is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in your workplace within a 14-day period. Reference section [3205.1](#) for details.]

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 testing

- We will provide COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period. COVID-19 testing will be provided at no cost to employees during employees' working hours.
- COVID-19 testing consists of the following:
 - All employees in our exposed workplace will be immediately tested and then tested again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by, the local health department.
 - After the first two COVID-19 tests, we will continue to provide COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
 - We will provide additional testing when deemed necessary by Cal/OSHA.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria** requirements, and local health officer orders if applicable.

Investigation of workplace COVID-19 illness

We will immediately investigate and determine possible workplace-related factors that contributed to the COVID-19 outbreak in accordance with our CPP **Investigating and Responding to COVID-19 Cases**.

COVID-19 investigation, review and hazard correction

In addition to our CPP **Identification and Evaluation of COVID-19 Hazards** and **Correction of COVID-19 Hazards**, we will immediately perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19.

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
 - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
 - Our COVID-19 testing policies.
 - Insufficient outdoor air.
 - Insufficient air filtration.
 - Lack of physical distancing.
- Updating the review:
 - Every thirty days that the outbreak continues.
 - In response to new information or to new or previously unrecognized COVID-19 hazards.
 - When otherwise necessary.
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and

review. We will consider:

- Moving indoor tasks outdoors or having them performed remotely.
- Increasing outdoor air supply when work is done indoors.
- Improving air filtration.
- Increasing physical distancing as much as possible.
- Respiratory protection.
- [describe other applicable controls].

Notifications to the local health department

- Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in our workplace, we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- We will provide to the local health department the total number of COVID-19 cases and for each COVID-19 case, the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and North American Industry Classification System code of the workplace of the COVID-19 case, and any other information requested by the local health department. We will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace.

Additional Consideration #2

Major COVID-19 Outbreaks

[This section will need to be added to your CPP should your workplace experience 20 or more COVID-19 cases within a 30-day period. Reference section [3205.2](#) for details.]

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 testing

We will provide twice a week COVID-19 testing, or more frequently if recommended by the local health department, to all employees present at our exposed workplace during the relevant 30-day period(s) and who remain at the workplace. COVID-19 testing will be provided at no cost to employees during employees' working hours.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees with COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria**, and any relevant local health department orders.

Investigation of workplace COVID-19 illnesses

We will comply with the requirements of our CPP **Investigating and Responding to COVID-19 Cases**.

COVID-19 hazard correction

In addition to the requirements of our CPP **Correction of COVID-19 Hazards**, we will take the following actions:

- In buildings or structures with mechanical ventilation, we will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, we will use filters with the highest compatible filtering efficiency. We will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems would reduce the risk of transmission and implement their use to the degree feasible.
- We will determine the need for a respiratory protection program or changes to an existing respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- We will evaluate whether to halt some or all operations at our workplace until COVID-19 hazards have been corrected
- Implement any other control measures deemed necessary by Cal/OSHA.

Notifications to the local health department

We will comply with the requirements of our **Multiple COVID-19 Infections** and **COVID-19 Outbreaks-Notifications to the Local Health Department**.

Additional Consideration #3

COVID-19 Prevention in Employer-Provided Housing - non applicable

Additional Consideration #4

COVID-19 Prevention in Employer-Provided Transportation to and from Work-non applicable