



PALMER
College of Chiropractic

The Trusted Leader in Chiropractic Education

AUGUST 4, 2021

COVID-19 Prevention Program
WEST CAMPUS

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COVID-19 Prevention Program for Palmer College of Chiropractic West

COVID-19 PANDEMIC

The novel coronavirus, SARS-CoV-2, causes a viral respiratory illness called COVID-19, which can make people sick with flu-like and other symptoms. The [virus spreads](#) easily when an infected person sneezes, coughs, or speaks, sending tiny droplets into the air. These droplets can land in the nose, mouth, or eyes of someone nearby and cause illness. This viral illness can also be caught from airborne virus, when small particles of infectious virus remain suspended in the air and people inhale them. People can also become infected if they touch an infectious virus on a surface and then touch their own nose, mouth, or eyes.

Some of the [symptoms](#) of COVID-19 are cough, fever, shortness of breath, and new loss of taste or smell. Some people with mild cases may have no symptoms at all yet still can spread the virus. Avoiding crowded indoor spaces, improving indoor ventilation, staying at least six feet away from people outside of your household, covering your nose and mouth with a face covering, and washing hands often with soap and water can help stop COVID-19 from spreading in the workplace.

COVID-19 PREVENTION PROGRAM

Palmer College of Chiropractic West is committed to protecting our employees, students, visitors and patients (aka “community members”) and preventing the spread of COVID-19 on our campus. We developed this program to reduce our community’s risk of catching and spreading this virus. We encourage everyone to share information about potential COVID-19 hazards on our campus and assist in evaluating these hazards. We will investigate all campus illnesses and correct hazards that are identified. We stay informed on the virus presence in our broader community as well as recommendations made by national and local health agencies. We review and update this plan as necessary. This plan was last reviewed on 07/02/2021.

Palmer College of Chiropractic West will endeavor to keep this program plan up to date and based on the latest regulations and guidance. However, even if this plan is not updated, Palmer College of Chiropractic West will abide by the latest, in effect regulations and guidance notwithstanding the fact that this plan has not been updated.

DESIGNATION OF RESPONSIBILITY

Gregory J. Snow, DC has the authority and responsibility for implementing this plan on our campus. All managers and supervisors are responsible for implementing this plan in their assigned areas and ensuring community members’ questions are answered in a language they understand.

All community members are required to follow the policies and procedures laid out in this plan, use safe campus practices, and assist in maintaining a safe campus environment.

IDENTIFICATION AND EVALUATION OF COVID-19 HAZARDS

We evaluate our campus and operations to identify tasks that may have exposure to COVID-19. The evaluation includes all interactions, areas, activities, processes, equipment, and materials that could present potential exposure to COVID-19. Assessments include interactions with all persons who may be present in the workplace: contractors, vendors, customers, and members of the public. Evaluations include:

- Identification of places and times when people may gather or come in contact with each other, even if they aren’t working. Examples: meetings, trainings, workplace entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting rooms.

- Community members’ potential campus exposure to all persons on campus. We will consider how community members enter, leave, and travel through the campus, in addition to addressing stationary work.
- Existing COVID-19 prevention measures and whether we need different or additional control measures.

Employee Participation - We encourage employees to participate in this evaluation. They can contact Lonnie Contreras to share information on potential COVID-19 hazards at our workplace or to assist in evaluating these hazards.

We will evaluate how to maximize ventilation with outdoor air for our indoor spaces and the highest level of filtration efficiency that is feasible for our building mechanical ventilation system. We will also evaluate whether the use of portable or mounted HEPA filtration units, or other air cleaners, can additionally reduce the risk of airborne transmission. The [CDPH’s Interim guidance for Ventilation, Filtration, and Air Quality in Indoor Environments](#) will be used during these evaluations.

Employees may confidentially inform Barry Pence and/or Lonnie Contreras if they have a higher risk for severe illness from COVID-19, such as those with conditions like lung disease, obesity, or cancer. They will have priority for lower exposure job assignments or working from home whenever possible.

The jobs/tasks/activities at Palmer College of Chiropractic West have been assessed as follows:

Table 1 – Risk Assessment

Job Title or Task	Description of Exposure Risk
Main Entrance	Close contact with individuals in close proximity to each other
South Entrance	Close contact with individuals in close proximity to each other
Clinic Screening Area	Close contact with individuals in close proximity to each other
Clinic Front Desk Area	Close contact with individuals in close proximity to each other
Clinic Waiting Room	Close contact with individuals in close proximity to each other
Clinic/Patient Care	Individuals in close proximity to each other.
Class Teaching/Instruction	Individuals in close proximity to each other for extended time periods.
Cafeteria	Individuals in close proximity to each other for extended time periods. Mask wearing not feasible while consuming food/beverage.
Library	Individuals in close proximity to each other for extended time periods.

CORRECTION OF COVID-19 HAZARDS

We treat all persons, regardless of symptoms or negative test results, as potentially infectious. We select and implement [feasible control measures](#) to minimize or eliminate employee exposure to COVID-19. We review orders and guidance on COVID-19 hazards and prevention from the State of California and the Santa Clara County health department, including general information and information specific to our industry, location, and operations. We correct unsafe or unhealthy conditions, work practices, policies, and procedures in a timely manner based on the severity of the hazard.

Table 2 – Controls to Reduce Exposure

Job Title/Task/Work Area	Engineering Controls	Administrative Controls	PPE
Clinic Screening Area	Plexiglass barriers between employees and customers	Symptom screening form posted prior to clinic entrance, self-screening document required and temperatures taken with contactless infrared thermometer; visual cues and physical distancing encouraged; face coverings required.	Face covering available. Respirators available upon request to unvaccinated employees.
Clinic Front Desk Area	Plexiglass barriers between employee and customer	Face coverings required; visual cues and physical distancing encouraged; encourage contactless payment.	Face covering available. Respirators available upon request to unvaccinated employees. Hand sanitizer available.
Clinic Waiting Room	Chairs set at 6 ft. social distancing	Face coverings required; physical distancing encouraged.	Face covering available. Hand sanitizer available.
Clinic/Patient Care	Patients seen in private rooms to maintain social distancing from other patients. All surfaces disinfected between each patient encounter.	Face coverings required.	Face covering available. Hand sanitizer, disinfectant, and paper towels available for use.
Intern Work Room	Maximize ventilation, use of HEPA 13 filtration. Regular cleaning of common touch surfaces.	Face coverings required.	Hand sanitizer, disinfectant, and paper towels available for use.
Class Teaching/Instruction	Maximize ventilation, use of HEPA 13 filtration. Regular cleaning of common touch surfaces.	Face coverings required.	Hand sanitizer, disinfectant and paper towels available for use.
Cafeteria	Maximize ventilation, use of HEPA 13 filtration. Separation of tables to obtain physical distancing of 6'. Regular cleaning of common touch surfaces.	Face coverings required. Dining must take place outdoors.	Hand sanitizer, disinfectant and paper towels available for use.
Library	Maximize ventilation, use of HEPA 13 filtration. Separation of tables to obtain physical distancing of 6'. Regular cleaning of common touch surfaces.	Face coverings required.	Hand sanitizer, disinfectant and paper towels available for use.
North Desk Entrance	Hanging Plexiglass barriers	Face coverings required.	Face covering available, masks supplied if needed. Hand sanitizer, disinfectant and paper towels available for use.

South Desk Entrance	Hanging Plexiglass barriers.	Face coverings required.	Face covering available, mask supplied if needed. Hand sanitizer, disinfectant and paper towels available for use.
Gym	Maximum ventilation use of HEPA13 filtration. Filters changed every 25 days.	Face coverings required.	Face covering available, mask supplied if needed. Hand sanitizer, disinfectant and paper towels available for use.
Front Lobby	Seating separated by social distancing. Monitored by front desk security.	Face coverings required.	Face covering available, mask supplied if needed. Hand sanitizer, disinfectant and paper towels available for use.

We inspect periodically to check that controls are effective, to identify unhealthy campus conditions or practices, and to ensure compliance with this plan. Any deficiencies are corrected right away, and we update this plan if needed.

Engineering Controls – Equipment and Building Systems to Minimize Exposures

Our engineering controls for COVID-19 include:

- Maximizing outdoor air for ventilation through our HVAC as much as feasible except when EPA’s Air Quality Index is greater than 100 or when increasing outdoor air would cause harm to employees, such as excessive heat or cold.
- Evaluating how to increase filtration efficiency to the highest level compatible with the existing ventilation system.

Administrative Controls – Policies, Procedures, and Practices to Minimize Exposure

Our administrative controls for COVID-19 are:

- **Screening Community Members and Visitors** to our facility through the following methods:
 - Online Screening – Employees, contractors and students self-screen using a web-based application accessible from home devices our mobile devices (cell phones) through the Palmer College App. All students and employees accessing campus must do so through one of three entrances with security personnel and display a “cleared” screen on their device to enter. The screening app screens for COVID-19 symptoms, vaccine status, positive cases and close contact. Those who are not cleared will be directed to trained personnel to determine if they may access the campus or be directed to follow the isolation protocols.
 - Onsite Screening – Signage restricting access to those with COVID-19 illness symptoms will be placed at all entrances.
 - Visitor Screening - We have a symptom screening form posted at the entrances to our worksite and ask visitors to self-screen before entering the worksite. Visitors are then required to complete a screening document and temperatures are taken with contactless infrared thermometer.

We prohibit any community member or visitor sick with COVID-19 from entering the campus. Anyone exhibiting any potential symptoms of COVID-19 should contact Lonnie Contreras (employees) or Michael Crump (students) and leave campus.

- **Wearing a Face Covering:**

Palmer College of Chiropractic West will follow current [Santa Clara County](#) and/or [state guidelines](#), whichever is more restrictive, around physical distancing and masking.

- Everyone, regardless of vaccination status, is required to wear a mask while indoors.
- We provide face coverings to all employees. Students, patients and visitors are expected to supply their own face coverings. A small supply of face coverings will be available for all community members on an as needed basis. We will ensure that face coverings are worn by community members as required by orders from CDPH. We will not prevent any community member from wearing a face covering when required unless it would create a safety hazard, such as interfering with the safe operation of equipment.
- Face coverings will be cloth or woven material of at least two layers, fit snugly, have no holes or openings, and completely cover the nose and mouth. With the June 2021 revision of the temporary standard, the definition of “face covering” also includes respirators worn voluntarily. Face coverings must be clean and undamaged. **Face coverings are not respiratory protection.**

When community members are required to wear a face covering, the following exceptions will apply:

- When a community member is alone in a private room or vehicle.
- When community members are required to wear respirators and in accordance with Section 5144.
- When employees or students cannot wear face coverings due to a medical or mental health condition or disability, as verified through Human Resources (employees) or Student Services (students). This includes a hearing-impaired person or someone using sign language to communicate.
 - Employees or students exempted from wearing a face covering due to medical conditions, mental health conditions, or disability must wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom that we will provide, if their condition or disability allows.
- When a specific task cannot be performed with a face covering. This exception is limited to the time period in which such tasks are being performed.

Community members not wearing a face covering, face shield with drape, or respirator, for any reason, will stay at least six feet away from all other people on campus. Unvaccinated employees may be tested for COVID-19 during paid time and at no cost to the employee. We will not use these physical distancing or testing provisions as an alternative to face coverings when they are otherwise required by Section 3205.

Signs are posted at the entrance to the workplace to communicate face coverings requirements for any visitors entering the workplace. We provide face coverings to members of the public if necessary and instruct employees to remain at least six feet away from members of the public who will not wear a required face covering.

- **Practicing Good Hygiene.** Wash hands with soap and water for at least 20 seconds, or use alcohol-based hand sanitizer with at least 60% alcohol. Hand sanitizer stations and hand hygiene signage are placed throughout the workplace. Lonnie Contreras and Tanya Rodriguez are responsible for ensuring hand hygiene stations are readily accessible and stocked with soap and paper towels, or sanitizer.
- **Cleaning and Disinfecting Frequently.** Surfaces, especially frequently touched surfaces, will be cleaned frequently. Indoor areas, materials, and equipment that will be used by another community member within 24-hours of use by a COVID-19 case will be disinfected with products that meet the [EPA’s criteria for use against](#)

[coronavirus](#). Disinfectants are used according to manufacturer’s directions. Employees using disinfectant products are trained on the hazards of the disinfectants, to use only in well-ventilated areas, any PPE that is required, and to never mix chemicals. Surfaces are cleaned and disinfected according to the following schedule:

Table 3 – Cleaning and Disinfection Practices

Surface/Area	Cleaning and Disinfection Method/Product	Frequency
Clinic/ Front Desk/rooms/ Clinic Restroom	<p>PPE: GLOVES, MASK, DISINFECTANT, UV WAND. Please note we have face shields and thermometers as needed.</p> <p>Wipe down with clean cloth sprayed by disinfectant (Cavicide):</p> <ul style="list-style-type: none"> • Front entrance glass door, door handles, countertops, chairs, light switches, seating area, garbage cans, front office computers all countertops, copy machine, phones, office handles, all computers through out and all cabinets found around campus. Everything in the intern workroom as well. • Tables, furniture, door handles, light switches, and all other misc. area’s get thoroughly cleaned every ½ hour including areas mentioned above. All X-ray chairs, equipment, light switches, door handles, garbage cans are all checked, emptied, and disinfected as well as all viewing boxes. 	Every other hour unless noted. See method/product column.
Classrooms /Hallways	<p>Wipe down with a clean cloth sprayed by Cavicide disinfectant:</p> <ul style="list-style-type: none"> • Tables, trophy cases, cabinets, desks, light switches, door handles, garbage cans. 	Cleaned every hour throughout day from 6:00am – 11:30pm
Cafeteria	<p>Wipe down with a clean cloth sprayed by Cavicide disinfectant:</p>	Cleaned every hour throughout day from 6:00am – 11:30pm

	<ul style="list-style-type: none"> • Tables, desks, counters, furniture, microwaves, bar stools, chairs, light switches, door handles, garbage cans and refrigeration equipment. 	
Library/Restrooms	<p>Wipe down with a clean cloth sprayed by both Cavicide and bleach disinfectants:</p> <ul style="list-style-type: none"> • Stalls, toilets, sinks, counters mirrors, light switches, door handles, garbage cans. • Tables, desks, counters, furniture, stools, chairs, computers stations, light switches, door handles, garbage cans. 	Cleaned every hour throughout day from 6:00am – 11:30pm
Campus/Bathrooms	<p>Wipe down with a clean cloth sprayed by both Cavicide and bleach disinfectants:</p> <ul style="list-style-type: none"> • Stalls, toilets, sinks, counters mirrors, light switches, door handles, garbage cans. 	Cleaned every hour throughout day from 6:00am – 11:30pm
Gym	<p>Wipe down with a clean cloth sprayed by both Cavicide and bleach disinfectants:</p> <ul style="list-style-type: none"> • Gym equipment, barbells dumbbells, benches, mirrors, light switches, door handles and garbage can. 	Cleaned every hour throughout day. Note: Hours of operation for gym 9:00am-6:00pm Mon-Fri.

Personal Protective Equipment (PPE) – Equipment Worn by Employees to Minimize Exposure

In general, employees will not be required to use respirators at Palmer College of Chiropractic West for protection from COVID-19. If a hazard assessment determines respirators are needed, they will be used in accordance with [Title 8, Section 5144](#). Respirators for voluntary use will be provided to employees upon request in the following situations:

- For all employees who are not fully vaccinated working indoors or in vehicles with others.

When respirators are provided for voluntary use, we will encourage their use, provide the correct size, and ensure use is in compliance with Subsection 5144(c)(2), which includes determining that respirator use will not in itself create a hazard and providing employees with [Appendix D](#) to Section 5144.

Any PPE used to protect from COVID-19, such as gowns, face masks, and gloves, is selected based on function, fit, and availability. Employees are trained when and why PPE is necessary, how to properly put on and take off PPE, and how to clean, maintain, and store reusable PPE. Job hazard assessments are performed by supervisors to identify any PPE required for a specific job. Supervisors are responsible for ensuring that adequate supplies of PPE are available.

COVID-19 Testing

We will make COVID-19 testing available at no cost and during paid time to employees who have symptoms of COVID-19 and are not fully vaccinated. COVID-19 testing will be made available to employees who have close contact in the workplace as outlined in the INVESTIGATING AND RESPONDING TO COVID-19 CASES IN THE WORKPLACE section below. Other community members (students, patients and visitors) are responsible for costs, if any, incurred for COVID-19 testing.

INVESTIGATING AND RESPONDING TO COVID-19 CASES IN THE WORKPLACE

Illness at the Workplace

We investigate all COVID-19 cases on campus. Our investigation includes seeking information from employees and students on COVID-19 cases and close contacts, obtaining information on COVID-19 test results and symptom onset, identifying and recording COVID-19 cases, and reporting when required by the regulations.

We require all employees and students to complete a Daily Tracking App prior to entering the building that screens for COVID-19 symptoms, positive cases and close contacts. This app collects information on employee and student name, time completed and date. Patients accessing our public clinic must check in and check out at the front desk and their relevant information is maintained in our recordkeeping system. Visitors accessing our workplace complete a log that includes name, contact number, date, time in, time out, person(s) contacted, and area of the workplace accessed. We will use this information to identify individuals to contact following notification of a COVID-19 case at our workplace.

We will not reveal any personally identifiable information or medical information to any person or entity unless required by law (such as Cal/OSHA, local health department, and local law enforcement).

Notification

Employees and students must alert college officials of [Potential Exposure or Symptoms](#) or [Positive](#) COVID-19 diagnosis by completion of the relevant form from the Palmer network. Employees and students can access these forms through the Palmer website [COVID-19 Updates](#) page or from any Brightspace (learning management system) course home page. We do not discriminate or retaliate against employees or students for reporting positive test results or symptoms.

Following notification of a positive test/diagnosis, we will immediately take the following actions:

1. Determine the day and time the COVID-19 case was last present on campus, the date of the positive test/diagnosis, and the date the COVID-19 case first experienced symptoms.
2. Determine who may have had close contact with the COVID-19 case by reviewing the case's activities during the high-risk period. The high-risk period **for persons who develop symptoms** is from two days before they first develop symptoms until 10 days after symptoms first appeared and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved. The high-risk period **for persons who test positive but never develop symptoms** is from two days before until 10 days after their first positive test for COVID-19 was collected.
3. Within one business day of knowing, or should have known, of a positive test/diagnosis, Lonnie Contreras (employees) or Michael Crump (students) will notify in writing, in a readily understandable form, all employees, students, independent contractors, and others who were on campus during the high-risk exposure period, that they may have been in close contact. The notice will include our disinfection plan as required by [Labor Code Section 6409.6\(a\)\(4\)](#). Verbal notice will be provided to those community members who have limited literacy in the language of the written notice, or those the college should reasonably know have not received the written notice. When providing notice under this section, we will not disclose the identity of the infected person(s).
4. Within one business day of knowing, or should have known, of a positive test/diagnosis, Lonnie Contreras (employees) or Michael Crump (students) will provide notice required by Labor Code section 6409.6(a)(2) and (c) to the authorized representative of any employee or student on campus during the high-risk exposure period.

5. We will make [COVID-19 testing](#) available to our employees who had close contact with the COVID-19 case at no cost during working hours, and information on COVID-19 related benefits, with the following exceptions:
 - Employees who were fully vaccinated prior to close contact and do not have COVID-19 symptoms.
 - Employee COVID-19 cases who have met the return-to-work criteria and remain symptom free for 90 days after the initial onset of symptoms or the first positive test for asymptomatic cases (“recovered COVID-19 cases”).

NOTE – Fully vaccinated or recovered COVID-19 cases listed above will have testing made available to them if they develop symptoms following close contact in the workplace.

6. Investigate whether any workplace factors contributed to the infection and how to further reduce that potential exposure.

We will provide information about [COVID-19 related benefits](#) at the time of excluding an employee from the workplace due to becoming a COVID-19 case or having close contact. **Confidentiality will be maintained at all times.**

We keep a record of and track all COVID-19 cases to include: employee’s or student’s name, contact information, occupation, location(s) where they were on campus, the date of the last day on campus, and the date of a positive COVID-19 test. This information is kept confidential.

Disinfection after Positive Test/Diagnosis

If it has been less than 24 hours since the COVID-19 positive community member has been in the facility, we will close off any areas used by the sick individual and thoroughly clean and disinfect. If greater than 24 hours will pass before the area is accessed by others, the routine cleaning procedures in Table 3 will be followed. During cleaning and disinfection, we will increase outdoor air circulation by opening windows or changing HVAC settings.

Exclusion from Campus

The following community members will be excluded from campus:

- Those who test positive for COVID-19 until the **Return to Campus** criteria in the next section are met.
- Those that have had close contact with the COVID-19 case until the **Return to Campus** criteria in the next section are met. This will not apply to the following:
 - Those who were fully vaccinated prior to close contact and do not develop COVID-19 symptoms.
 - Recovered COVID-19 cases who have met the return to campus criteria and remain symptom free for 90 days after the initial onset of symptoms or the first positive test for asymptomatic cases.

Employees excluded from work due to a positive test/diagnosis from workplace close contact, or identified as having close contact in the workplace, will have their earnings, wages, seniority, and all other rights and benefits maintained by Palmer College of Chiropractic West. Wages during exclusion will be paid at the regular rate of pay on the regular pay day for the pay period. Employees will be informed if wages will not be maintained because the employee received disability payments or was covered by workers’ compensation and received temporary disability. Information on available employee benefits will be provided at the time of exclusion.

Return to Campus

Criteria for returning to work after testing positive for COVID-19 are as follows:

- Employees and students who have been excluded from campus must complete the [Request to Return to Campus After Exposure or Diagnosis](#) form found on the Palmer Website [COVID-19 Updates](#) and Brightspace course home pages.
- Employees who tested positive and had symptoms can return to work when:
 - At least 10 days have passed since symptoms began, **AND**

- At least 24 hours have passed with no fever (100.4°F or above) without the use of fever-reducing medications, **AND**
- Other COVID-19 symptoms have improved.
- Employees who test positive but never have symptoms can return to work:
 - After at least 10 days have passed since the date of positive specimen collection.
- Employees who had close contact can return to work:
 - After 10 days have passed since their last known close contact if they never develop symptoms.
 - If symptoms develop, all of the following must be met:
 - Negative PCR COVID-19 test taken after onset of symptoms, **AND**
 - At least 10 days have passed since last known close contact, **AND**
 - The employee has been symptom-free for at least 24 hours without the use of fever reducing medication.
 - During critical staffing shortages, when there are not enough staff to provide safe patient care, essential critical infrastructure workers in the following categories may return to work after Day 7 from the date of last exposure if they have received a negative PCR COVID-19 test result from a specimen collected after Day 5:
 - Health care workers who did not develop COVID-19 symptoms.
- Employees who have completed the required time to isolate, quarantine, or exclude ordered by a local or state health official can return to work. If the exclusion time period was not specified, one of the symptom-based criteria above will be used to determine when to return to work.
- Employees that have approval from Cal/OSHA on the basis that removal of the employee would create undue risk to a community's health and safety can return to work. In these instances, effective control measures such as isolation or respiratory protection will be implemented to prevent infection of other employees at the workplace.

REPORTING, RECORDKEEPING, AND ACCESS

Reporting

[Reporting to the Local Health Department \(LHD\)](#) – This requirement also complies with AB 685.

Within 48-hours of knowledge, Lonnie Contreras will notify the [local health department](#) (LHD),

- Santa Clara County Public Health:
- Phone Number 408-792-5040
- Link: <https://covid19.sccgov.org/sites/g/files/exjcpb766/files/Documents/Education-Reporting-Portal-Worksheet.pdf>

of any campus outbreak of COVID-19. An outbreak reportable to our LHD is defined as at least three COVID-19 cases among community members on campus within a 14-day period. We will work with the LHD to carry out contact tracing and follow all LHD recommendations including temporary closure of our campus if advised.

[Reporting to our Claims Administrator – SB 1159](#)

Lonnie Contreras will report to Travelers Insurance Company when an employee has tested positive for COVID-19. This report will be made within three days of knowledge of an employee's positive test result.

[CAL/OSHA Recording/Reporting](#) - We will record on our case log all work-related COVID-19 cases that meet one of the following criteria: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, loss of consciousness, significant injury or illness diagnoses by a physician or other licensed health care professional.

We will report any serious COVID-19 illness that required inpatient hospitalization or resulted in death to our local Cal/OSHA office as soon as possible, but in no case more than eight hours after knowledge.

Recordkeeping

Palmer College of Chiropractic West maintains records of the steps taken to implement this written program. These records include but are not limited to training, inspections, hazard identification, etc.

We keep a record of and track all COVID-19 cases. These records include the community member's:

- Name
- Contact information
- Occupation
- Locations on campus community member accessed.
- Date of the last day on campus
- Date of positive COVID-19 test

All medical information will be kept confidential. The log of COVID cases, with names and contact information removed, will be made available to employees, authorized employee representatives, or as otherwise required by law.

Access

This program will be made available on campus to employees, students, authorized employee representatives, and to representatives of Cal/OSHA.

COMMUNICATION SYSTEMS

We ask all community members to confidentially report, without fear of discrimination or retaliation, any symptoms, potential exposures, and possible hazards relating to COVID-19 on campus. Employees should make these reports to Lonnie Contreras (employees) and Michael Crump (students) using the [Potential Exposure or Symptoms](#) or [Positive COVID-19 diagnosis forms](#).

We explain to all employees how we accommodate employees at higher risk of severe COVID-19 illness. They can make a confidential report of their own high-risk condition to Human Resources/Barry Pence.

If a community member is suspected of having a campus exposure to COVID-19 or is experiencing symptoms of COVID-19 and is not fully vaccinated, we will provide information about access to COVID-19 testing. Employee COVID-19 testing will be at no cost and during paid work hours. We will also provide information about testing to vaccinated employees who develop COVID-19 symptoms after a close contact. Local COVID-19 testing is available in our area through the following:

Walgreens:

- 1833 N. Milpitas Blvd. Milpitas, CA 95035.
- 1661 McKee Rd. San Jose, CA 95116.

CVS:

- 4110 N. 1st San Jose, CA 95134.
- Pharmacy (inside of Target) 95 Holger Way San Jose, CA 95134.

OptumServe: North Milpitas Community Center

- 457 E. Calaveras Blvd. Milpitas, CA 95035

County Links:

- <https://carbonhealth.com/coronavirus/covid-19-testing-centers>
- <https://covid19.sccgov.org/covid-19-testing>

Note: Additional communication requirements may apply depending upon severity of outbreak. See Appendix A for multiple COVID-19 infections and outbreak procedures. See Appendix B for major outbreak procedures.

We communicate information about COVID-19 hazards and our COVID-19 policies and procedures to employees, students, and other employers, persons, and entities that come in contact with our workplace. Other employers must ensure their employees follow our plan or equivalent to ensure protection of both their and our employees.

EMPLOYEE TRAINING AND INSTRUCTION	
We provide all employees training and instruction on the symptoms of COVID-19 illness and exposure control methods in place at Palmer College of Chiropractic West including:	
Information on how COVID-19 spreads, including airborne and asymptomatic transmission.	Vector Solutions LMS® Coronavirus Awareness Course
The fact that viral particles can travel more than 6’, especially indoors, so physical distancing, face coverings, increased ventilation, and respiratory protection can decrease the spread of COVID-19, but are most effective when used in combination.	
Symptoms of COVID-19.	
The importance of getting a COVID-19 test and staying out of the workplace if you have symptoms.	
The importance of vaccination against COVID-19 .	
Information on our COVID-19 policies, how to access COVID-19 testing and vaccination, and the fact that vaccination is effective at preventing COVID-19 – protecting against both transmission and serious illness or death.	
Our symptom screening procedures for community members and all other visitors to the workplace.	
Risk of exposure to COVID-19 on the job.	
Cleaning and disinfection schedules and procedures for our campus.	Palmer Portal Safety and Security – COVID -19 Resources
Control measures to protect community members from exposure and infection:	
<ul style="list-style-type: none"> • Requiring employees and students to stay home when sick. 	
<ul style="list-style-type: none"> • Frequent handwashing with soap and water for at least 20 seconds, or using hand sanitizer when handwashing sinks are not readily accessible. 	
<ul style="list-style-type: none"> • Conditions that require the use of face coverings on campus, the requirement for people who are not fully 	

vaccinated to wear a face covering if outdoors if 6’ of distance between people can’t be maintained, and how to request face coverings on campus.	
<ul style="list-style-type: none"> • Proper use of a face coverings when required and the fact that a face covering is NOT respiratory protection. Face coverings are source control used to contain infectious particles and protect others; respirators protect the wearer from infectious airborne particles. 	
<ul style="list-style-type: none"> • Covering coughs and sneezes. 	
Acceptable PPE and proper use.	
Policies for providing respirators and the right of employees who are not fully vaccinated to request a respirator for voluntary use. When respirators are provided for voluntary use:	in accordance with Title 8, Section 5144
<ul style="list-style-type: none"> • How to properly wear the respirator provided, and 	
<ul style="list-style-type: none"> • How to perform a user seal check each time the respirator is donned, and 	
<ul style="list-style-type: none"> • Facial hair can interfere with the seal of the respirator and reduce the amount of protection provided. 	
What to do if they are sick and how to obtain a COVID-19 test.	
Information on COVID-19-related leave benefits available under legally mandated sick and vaccination leave, if applicable, workers’ compensation law, local governmental requirements, Palmer College of Chiropractic West leave policies, leave guaranteed by contract, and section 3205.	Palmer Portal Human Resources – COVID-19 Furlough Resources
The contents of this plan.	

APPENDIX A - MULTIPLE COVID-19 INFECTIONS AND OUTBREAKS

The following procedures will be followed in addition to our CPP whenever three or more community members COVID-19 cases within an exposed group (as defined in section 3205(b)) have visited our workplace during their high-risk exposure period within a 14-day period. These procedures can be stopped only after no new COVID-19 cases are detected in the exposed group for a 14-day period.

Testing

Palmer College of Chiropractic West will make [testing available](#) to employees within the exposed work group at no cost during working hours except for:

- Employees not present during the outbreak period defined above.
- Employees who were fully vaccinated before the outbreak and do not have symptoms.
- Recovered COVID-19 cases who have returned to work after meeting the Return to Work criteria and do not develop symptoms for 90 days since their initial symptom onset or first positive test.

This testing will be made available immediately after determination of an outbreak, and then again one week later; negative test results will not change the quarantine, exclusion, or health order status of any individual. Following these two tests, we will make testing available to employees in the exposed group during the defined outbreak period at least once a week, or more frequently if recommended by the LHD. We will provide additional testing as required by the Division in accordance with any special order from Cal/OSHA.

Additional Controls to Correct COVID-19 Hazards

In addition to the controls listed in our CPP, we will do the following:

- Require community members in the exposed group to wear face coverings when indoors or when outdoors and less than 6' from another person unless one of the exceptions to face coverings listed in our CPP applies.
- Notify employees in the exposed group that they can request a respirator for voluntary use if they are not fully vaccinated.
- Evaluate whether to implement physical distancing of at least 6' between people, and where 6' of distance is not feasible whether to use cleanable solid partitions of sufficient size to reduce COVID-19 transmission.
- In buildings or structures with mechanical ventilation, we will maximize the outdoor air supply, and filter recirculated air with MERV 13 or higher efficiency filters if compatible with the ventilation system. If MERV 13 or higher filters are not compatible we will use filters with the highest rating that are compatible. We will further evaluate whether portable or mounted HEPA filtration units or other air cleaning systems would reduce the risk of transmission and if so implement their use where feasible.

Campus Investigation, Review, and Hazard Correction

We will investigate all campus illness to determine potential factors on campus that could have contributed to the COVID-19 outbreak. Additionally, we will review our relevant COVID-19 policies, procedures, and controls and we will implement changes needed to prevent further virus spread.

All investigations and reviews will be documented to include:

- Investigation of new or continuing COVID-19 hazards.
- Review of our leave policies and practices, including whether employees are discouraged from staying home when sick.
- Review of our COVID-19 testing policies.
- Investigation of the sufficiency of outdoor air.
- Investigation of the sufficiency of air filtration.
- Investigation into feasibility of physical distancing.

These reviews will be updated every 30 days that this appendix is in effect with new information, new or previously unrecognized COVID-19 hazards, or as necessary. We will make changes based on investigations and reviews to reduce the spread of COVID-19 and consider such actions as moving tasks outdoors, allowing employees to work remotely or students to attend remotely, increasing outdoor air supply to our indoor campus spaces, improving air filtration to the highest MERV rating compatible with our air handling system, increasing physical distancing as much as feasible, requiring respiratory protection in compliance with section 5144, or other applicable control measures.

Palmer College of Chiropractic West will endeavor to keep this program plan up to date and will abide by the latest regulations and guidance in effect.

APPENDIX B – MAJOR COVID-19 OUTBREAKS

The following procedures will be followed in addition to our CPP and Appendix A – Multiple COVID-19 Infections and Outbreaks, whenever 20 or more community members COVID-19 cases within an exposed group (as defined in section 3205(b)) have visited our campus during their high-risk exposure period within a 30-day period. These procedures will apply until there are fewer than three COVID-19 cases detected in the exposed group for a 14-day period.

Testing

Palmer College of Chiropractic West will continue to provide testing as described in Appendix A of our CPP except that testing will be made available to all employees in the exposed group, regardless of vaccination status, twice a week or more frequently if recommended by the Local Health Department (LHD).

Additional Controls to Correct COVID-19 Hazards

In addition to the controls listed in our CPP and Appendix A, we will do the following:

- Provide respirators for voluntary use to employees in the exposed group and determine the need for a respiratory protection program or changes to our existing program to address COVID-19 hazards and be in compliance with section 5144.
- Any community member in an exposed campus group not wearing a respirator required by Palmer College of Chiropractic West in compliance with section 5144 will be separated from other people by 6' except when demonstrated to not be feasible or when they are momentarily closer than 6' during movement. When it is not feasible to maintain 6' of distance, individuals will be as far apart as feasible. Methods for physical distancing include:
 - Reducing the number of persons in an area at one time (including visitors)
 - Visual cues such as signs and floor markings to show community member locations and paths of travel
 - Staggered arrival, departure, work, and break times
 - Adjusted work processes to allow greater distance between community members
 - Telework or other remote work arrangements
- At workstations such as cash registers, desks, and production lines, where an employee is assigned to work for an extended period of time and physical distancing is not maintained at all times, we will install cleanable solid partitions that will effectively reduce transmission.
- Evaluate whether to halt some or all operations at the workplace until COVID-19 hazards have been corrected.
- Take other control measures deemed necessary by the Division through the Issuance of Order to Take Special Action, in accordance with [Title 8 Section 332.3](#).