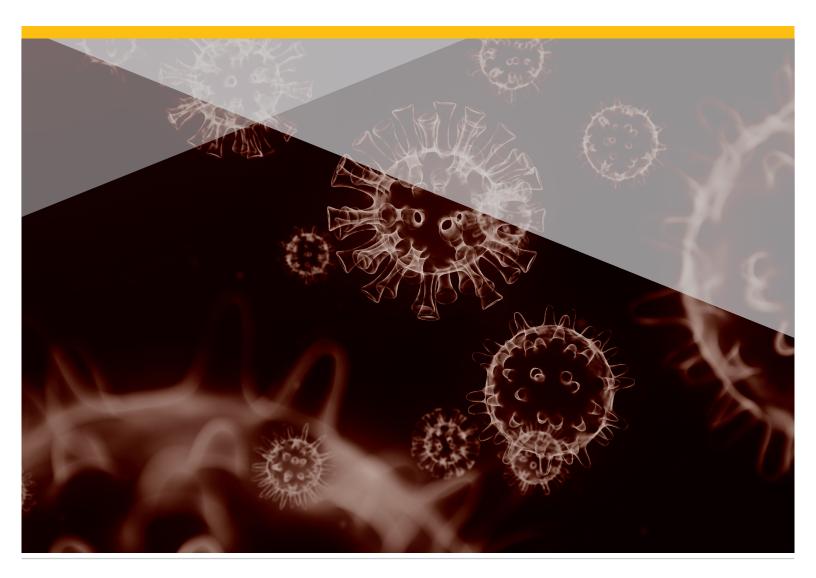
COVID-19 PREVENTION PROGRAM

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OFFICE OF ENVIRONMENTAL HEALTH & SAFETY



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The University of Southern California (USC) COVID-19 Prevention Program (CPP) is designed to control exposures to the SARS-CoV-2 virus that may occur in the workplace.

It was prepared in compliance with the Cal/OSHA Emergency Temporary Regulation for COVID-19 Prevention requirements (CCR, Title 8, Section 3205) and correlates with provisions of the university's Injury and Illness Prevention Program. It will be reviewed and updated periodically to reflect updates in local, state, and federal regulations as well as CDC guidance.

Additional information and supporting material is available at the EH&S COVID-19 Resource Center.

2.0 Regulations and Policies



State Cal/OSHA

Title 8:	Section 3205	COVID-19 Prevention
	Section 3205.1	Multiple COVID-19 Infection and COVID-19 Outbreaks
	Section 3205.2	Major COVID-19 Outbreaks
	Section 3205.4	COVID-19 Prevention in Employer-Provided
		Transportation to and from Work

COVID-19 Prevention Program

California approved emergency temporary Cal-OSHA standards on COVID-19 infection prevention. The COVID-19 Prevention Program (CPP) - CCR, Title 8, Section 3205 - requires employers to protect workers from hazards related to COVID-19.

The CPP applies to all employers, employees, and all places of employment except:

- Workplaces where there is only one employee who does not have contact with other people
- Employees who are working from home or remote location of their choice
- Employees who are covered by the Aerosol Transmissible Diseases (ATD) regulation CCR, Title 8 §5199

Cal-OSHA allows employers to include the CPP as part of their IIPP, however, USC has created a separate written plan that complies with COVID-19 Emergency Temporary Standards (ETS). USC's CPP correlates with provisions of the University's Injury and Illness Prevention Program. It will be reviewed and updated periodically to reflect updates in local, state, and federal regulations as well as CDC guidance.

Additional information and supporting material is available at the <u>EH&S COVID-19</u> <u>Resource Center</u>.

Injury and Illness Prevention Program

Title 8, Section 3203 of the California Code of Regulations requires every California employer to have an effective Injury and Illness Prevention Program (IIPP). The purpose of an IIPP is to establish a framework for identifying and correcting workplace hazards, ensuring employee training and compliance, and communicating information related to employee safety and health.



Environmental Health and Safety (EH&S)

The USC Office of Environmental Health & Safety (EH&S) has overall authority and responsibility for implementing the provisions of this CPP in the workplace.

Managers/Supervisors

All managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and ensuring employees receive answers to questions about the program in a language they understand.

Employees

All employees are responsible for adhering to provisions of the CPP, using safe work practices, following all directives, policies, and procedures, and assisting in maintaining a safe work environment.



USC EH&S will implement the following in the workplace:

- Conduct workplace-specific evaluations using <u>Return-to Work Criteria</u> Section 13.
- Evaluate employees' potential workplace exposures to all persons at the workplace or who may enter it.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the County of Los Angeles Department of Public Health related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in the workplace and the need for different or additional controls.
- Conduct periodic inspections, as necessary, to identify unhealthy conditions, work practices, and work procedures related to COVID-19 policies and procedures.
- Identify high-exposure areas in collaboration with contact tracing program and determine appropriate corrective action.

Employee Participation

Employees and their authorized employee representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards. EH&S will coordinate with supervisors to conduct site and procedures risk assessment. Employees will be encouraged to participate in risk assessment to better understand the hazards associated with the workplace.

Employees are required to complete the Health, Hygiene and Safety Training on Trojan Learn (see **Required Training for Returning Employees/Students** at the <u>EH&S COVID-19 Resource Center</u>) before returning to campus.

Employee Screening

All students, faculty, and staff members returning to campus will be required to complete <u>Trojan Check</u>, a brief wellness assessment that must be completed each day before entering campus. Trojan Check is available online. View an overview video of Trojan Check along with step-by-step videos for how to log in, create reservations and complete your wellness assessment.

Upon completion of the assessment, the system generates a pass/QR code required to access campus and select buildings. Employees that lack access to a tablet, laptop, or mobile device to complete Trojan Check are directed to their supervisors, department chairs, HR partners or deans of faculty to complete a hard copy Trojan Check form.

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 hazard(s).

The Office of Environmental Health & Safety in collaboration with Researchers, Department Heads, Directors, and Managers will conduct risk assessments of the school/department's workplaces. Findings/hazards discovered from inspections, complaints, referrals, or reports of positive COVID-19 cases will be corrected to prevent COVID-19 transmission and exposure.



Engineering Controls

There are currently no verified cases of transmission of COVID-19 from droplets traveling over large distances, including through air conditioning systems. All centrally controlled heating, ventilation, and air conditioning (HVAC) building systems are run at least one hour before and after building occupancy. Some systems are able to circulate 100 percent outside filtered air to flush buildings.

During the pandemic, the centrally managed demand control ventilation system is disabled to maximize the amount of outside air to each space within the buildings at all times. USC's HVAC systems are designed to meet all required ventilation standards and building codes by allowing enough fresh outdoor air to control contaminant levels in buildings.

Many USC buildings are not at full occupancy per local/state guidelines. Essential building occupants must adhere to local health and safety guidelines to prevent the spread of COVID-19. Higher per person outdoor airflow rates are needed to control contaminants, including COVID-19.

Particles containing the virus can travel more than six feet, especially indoors, so physical distancing, face coverings, increased ventilation indoors, and respiratory protection decrease the spread of COVID-19, but are most effective when used in combination.

Cleaning and Disinfecting

The university has implemented a robust cleaning and disinfection process to ensure that housing units, kitchens, bathrooms, and common areas are effectively cleaned to prevent the spread of COVID-19. EPA approved disinfectants are also available for individuals to sanitize their workspaces.

For additional information, refer to <u>Cleaning and Disinfecting During COVID-19 Guide Sheet</u>.

Additional areas shall be cleaned and disinfected after a COVID-19 case was present during the high-risk exposure period, if another resident will be there within 24 hours of the COVID-19 case. Cleaning and disinfecting shall be done in a manner that protects the privacy of residents.

Shared Tools and Equipment

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments, and tools must not be shared to the extent feasible. Where there is sharing, the items will be disinfected between uses by employees - disinfectant, materials, and training will be provided. Disinfectant bottles and wipes will be labeled with appropriate contact time for proper usage.

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users.

Cleaning of areas, material, and equipment used by a COVID-19 case during the high-risk exposure period, and disinfection if the area, material, or equipment is indoors and will be used by another employee within 24 hours of the COVID-19 case.

Hand Washing/Hand Sanitizing

USC implements effective hand washing/hand sanitizing at its campus locations by:

- Adding additional handwashing stations/facilities as demand arises.
- Strategic placement of hand sanitizing stations in buildings and facilities.
- Providing employees with an effective hand sanitizer and prohibiting hand sanitizers that contain methanol (i.e. methyl alcohol).
- Encouraging employees to wash their hands frequently and for at least 20 seconds each time or use an effective hand sanitizer.

Supervisors must ensure that hand sanitizers and tissues are supplied to all on-site employee workspaces. If additional supplies are needed, please contact USC Facilities and Planning Management.

Personal Protective Equipment (PPE)

Per the <u>California Department of Public Health (CDPH) Guidance for Face Coverings</u> and <u>USC's COVID-19</u> <u>Vaccination Program</u>, face coverings are required for unvaccinated individuals in indoor public settings and businesses with limited exemptions. A face covering means a surgical mask, a medical procedure mask, a respirator worn voluntarily, or a tightly woven fabric or non-woven material of at least two layers.

PPE may also be required per an EH&S risk assessment. USC will provide employees who are not vaccinated and work indoors or in vehicles with more than one person with PPE, including an N95 respirator for voluntary use if chosen by the employee.

PPE to Control Exposure to COVID-19

USC evaluates the need and will provide eye protection and respiratory protection in accordance with CCR Title 8 section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

6.0 COVID-19 Prevention in Employer-Provided Transportation

COVID-19 Prevention in Employer-Provided Transportation

The following section applies to any USC-provided vehicles used to transport any employee during the course and scope of University employment. The following section does not apply if:

- All passengers and the driver are from the same household outside of work (e.g., family members), or if the driver is alone in the vehicle.
- Transportation is necessary for emergency response, including firefighting, rescue, evacuation, and support activities directly aiding response such as utilities, communications, and medical operations.
- Employees have occupational exposure as defined by <u>CCR section 5199 (Aerosol Transmissible</u> <u>Diseases).</u>
- All passengers and the driver are fully vaccinated.
- Vehicle is considered public transportation.

Assignment of Transportation

To the extent feasible, sharing vehicles is limited to distinct groups and ensures that each group remains separate from other such groups during transportation and work activities.

Face Coverings and Respirators

USC will ensure that the:

- Face covering requirements, if applicable, will be followed for employees waiting for transportation
- All employees who are not fully vaccinated are provided with a face covering, which must be worn unless an exception under <u>CCR subsection 3205(c)6)(D) applies</u>.

Screening

Employees are required to complete their Trojan Check symptom screening before coming to work.

Cleaning and Disinfecting

USC will ensure that:

 All high-contact surfaces (e.g., door handles, seatbelt buckles, and armrests) used by passengers are cleaned to prevent the spread of COVID-19 and must be cleaned and disinfected if used by a COVID-19 case during the high-risk exposure period, when the surface will be used by another employee within 24 hours of the COVID-19 case.

- All high-contact surfaces used by drivers, such as the steering wheel, armrests, seatbelt buckles, door handles and shifter, are cleaned to prevent the spread of COVID-19 between different drivers and are disinfected after use by a COVID-19 case during the high-risk exposure period, if the surface will be used by another employee within 24 hours of the COVID-19 case.
- Sanitizing materials will be provided and kept in adequate supply.

Ventilation

USC will ensure that vehicle windows are kept open, and that the ventilation system is set to maximize outdoor air and not recirculate air. Windows do not have to be kept open if one or more of the following conditions exist:

- The vehicle has functioning air conditioning in use and excessive outdoor heat would create a hazard to employees.
- The vehicle has functioning heating in use and excessive outdoor cold would create a hazard to employees.
- Protection is needed from weather conditions, such as rain or snow.
- The vehicle has a cabin air filter in use and the U.S. EPA Air Quality Index for any pollutant is greater than 100.

Hand Hygiene

USC will provide hand sanitizer in each vehicle and ensure that all drivers and riders sanitize their hands before entering and exiting the vehicle. Hand sanitizers with methyl alcohol are prohibited.



If a COVID-19 case is discovered in the workplace, the following procedures will be implemented:

- 1. Investigations will be conducted using the Appendix C: Investigating COVID-19 Cases form.
- 2. Identify the areas visited by COVID-19 case via the contact tracing program.
- 3. Determine the extent of potential contamination and risk of exposure.
- 4. Contact custodial personnel to perform disinfection to the area, if required.

Employees who had potential COVID-19 exposure in the workplace will receive the following:

- COVID-19 testing at no cost during their working hours.
- Information on benefits described in Exclusion of COVID-19 Cases (see below) and Section 11, Training and Instruction. Information on leave, pay, and work arrangements is available.
- When students or employees are diagnosed with COVID-19, they are contacted by a dedicated USC contact tracing team through USC Student Health. USC Student Health will ask detailed information about contacts and activities during the infectious period.
- Contact tracing information is used for the sole purpose of protecting community health. For students, activities are not shared with student conduct teams or others in the University. The positive case's name is not shared when notifying those who may have been exposed. USC's concern is individual health and the health of the USC community.
- Information must be shared with the Los Angeles County Department of Public Health (LACDPH), but this information, including the name(s) of ill persons, is confidential to protect patient privacy.
- USC will provide regular online updates about rates of infection and notifications for groups who may have been exposed to a positive case of COVID-19. Notifications will be targeted to individuals and groups who may need to be tested, self-isolate, quarantine, or self-monitor for symptoms.

Exclusion of COVID-19 Cases

COVID-19 cases discovered in the workplace will be handled expediently to mitigate transmission and exposure of the virus. This is accomplished through:

- Self-quarantine of unvaccinated employees for a period of ten days and exclusion from the workplace until <u>Return-to Work Criteria</u> outlined in Section 13 are met. Fully vaccinated employees who do not show signs or symptoms of COVID-19 are not required to self-quarantine.
- Compliance with health orders issued by LACDPH/CDPH, if applicable.

COVID-19 cases that are determined to be work-related will have:

- Access to information on available benefits at the time of exclusion
- Continuance of employee earnings, seniority, and all other employee rights and benefits.

Contact the school/department's HR Partner for additional information.

8.0 Multiple COVID-19 Infections & Outbreaks

The following section applies in the event there are three (3) or more employee COVID-19 cases within an exposed group, as defined by section <u>CCR 3205(b)</u>, visited the workplace during their high-risk exposure period at any time during a 14-day period. The following actions will be taken:

- 1. Notify employees and supervisors of positive cases in the workplace within 24 hours.
- 2. Immediately notify LACDPH and submit a list of positive cases information.
- 3. LACDPH will review the submitted information and determine whether the outbreak criteria have been met.
- 4. EH&S to coordinate with LACDPH investigator to schedule document review, site visit and address inspection findings/recommendations.

This plan of action will stay in effect until there are no new COVID-19 cases detected in the exposed group for a 14-day period.

COVID-19 Testing

COVID-19 testing is available at no cost to USC employees within the exposed group. COVID-19 testing will be provided at no cost to employees during employees' working hours. Students, faculty, and staff who are fully vaccinated will no longer be required to participate in surveillance testing (Pop Testing) to access campus or take part in on-campus activities. Individuals are considered fully vaccinated after two weeks have passed following the second dose of a two-dose series (such as the Pfizer-BioNTech or Moderna vaccines) or a single dose of a single-dose series (such as the Johnson & Johnson vaccine). Trojan Check will require surveillance testing until COVID-19 records are submitted and reviewed.

COVID-19 testing consists of the following:

- COVID-19 saliva tests are scheduled via USC mySHR. USC has three (3) testing sites at UPC and one (1) testing site at HSC.
- Employees provide a saliva sample to Student Health Center personnel for testing. Negative results allow employees to have access to campus. Positive results trigger the contact tracing program.
- All employees in exposed workplaces will be immediately advised to get 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, isolation, or exclusion period required by, or orders issued by, the local health department. NOTE: Fully vaccinated individuals are not required to test or quarantine.
- After the first two COVID-19 tests, USC shall make COVID-19 testing available once a week at no cost, during paid time, to all employees in the exposed group who remain at the workplace or more frequently if recommended by the local health department.

COVID-19 Outbreak Follow-Up

See <u>Section 7 COVID-19 Case Investigation</u> and <u>Exclusion of COVID-19 Cases</u> for a follow-up to positive cases and potential exposures in the workplace. See <u>Section 4 Correction of COVID-19 Hazards</u> to address and remedy COVID-19 hazards. USC will immediately perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent the further spread of COVID-19.

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards, including:
 - Leave policies and practices and whether employees are discouraged from remaining home when sick
 - COVID-19 testing policies
 - Insufficient outdoor air
 - Insufficient air filtration
 - Lack of physical distancing
- Updating the review:
 - Every thirty (30) 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. This may include:
 - 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
 - Other applicable controls, as necessary

Notifications to the Local Health Department

Notifications to LACDPH will be immediate, but no longer than 48 hours, after learning of three or more COVID-19 cases in the workplace with epidemiological link, who do not share a household, and are not in close contact of each other outside of the campus. Notification of subsequent cases will be provided as well. Guidance on preventing the further spread of COVID-19 within the workplace will then be requested.

LACDPH will receive the total number of COVID-19 cases and for each COVID-19 case: (a) the name, (b) contact information, (c) occupation, (d) workplace location, (e) business address, (f) hospitalization and/or fatality status, (g) North American Industry Classification System code of the workplace of the COVID-19 case, and (h) any other information requested.

9.0 Major COVID-19 Outbreaks

In the event there are twenty (20) or more positive COVID-19 cases identified in an exposed group within a 30-day period, actions will be taken as described in <u>Section 8 Multiple COVID-19 Infections & Outbreaks</u>. This section will apply until there are fewer than three COVID-19 cases detected in the exposed group for a 14-day period.

COVID-19 Testing

USC will continue to provide COVID-19 testing per <u>Section 8 Multiple COVID-19 Infections & Outbreaks</u>, or more frequently if recommended by the local health department. COVID-19 testing will be made available to all employees in the exposed group, regardless of vaccination status.

Respirators for Voluntary Use

USC will provide a respirator for voluntary use in compliance with CCR 5144(c)(2) to employees in the exposed group and shall determine the need for a respiratory protection program or changes to an existing respiratory protection program.

Any employees in the exposed group who are not wearing respirators required by the employer and used in compliance with section 5144 shall be separated from other persons by at least six feet, except where an employer can demonstrate that six feet of separation is not feasible, and except for momentary exposure while persons are in movement. Methods of physical distancing include: telework or other remote work arrangements; reducing the number of persons in an area at one time, including visitors; visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel; staggered arrival, departure, work, and break times; and adjusted work processes or procedures, such as reducing production speed, to allow a greater distance between employees. When it is not feasible to maintain a distance of at least six feet, individuals shall be as far apart as possible.

At work stations where an employee in the exposed group is assigned to work for an extended period of time, such as cash registers, desks, and production line stations, and where the physical distancing requirement in subsection (c)(2) is not maintained at all times, the employer shall install cleanable solid partitions that effectively reduce transmission between the employee and other persons.

The employer shall evaluate whether to halt some or all operations at the workplace until COVID-19 hazards have been corrected.

Any other control measures deemed necessary by the Division through the Issuance of Order to Take Special Action.



USC's goal is to ensure easy and effective two-way communication with employees. The following elements may be included in the communication:

- Self-Reporting
 - Employees self-report COVID-19 symptoms and possible hazards immediately to their supervisor and contact the COVID-19 hotline at 213-740-6291 or covid19@usc.edu. Employees are encouraged to report symptoms and hazards without fear of reprisal.
 - All USC employees present in campus facilities or working in campus programs that have tested positive for COVID-19 must self-report and notify the University immediately by contacting the USC COVID-19 hotline at 213-740-6291 or covid19@usc.edu. Failure to report positive tests and/ or continue to enter the campus may result in immediate disciplinary action up to and including termination without the benefit of any further warning.
 - Upon contacting the University, the employee will be asked for details of USC-related activities, identify other USC employees and students with whom they have had contact and where, the date of the diagnosis, and the date when symptoms first appeared. This information will only be shared with those who need to know to address health and safety considerations.
- Testing
 - In the event of a high-risk workplace exposure, unvaccinated employees will be asked to quarantine (employees who are fully vaccinated and not showing any symptoms will not have to quarantine). USC will offer free COVID-19 testing via the onsite testing facilities. USC 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.
 - Graduate and professional students, faculty, and staff are required to test once a week. USC has three (3) testing sites on UPC campus and one (1) at HSC campus. Faculty, staff and students can schedule an appointment for testing via Trojan Check site.
- Protocol
 - Procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
 - Information about COVID-19 hazards employees (including other employers and individuals in contact with USC workplace) may be exposed to, what is being done to control those hazards, and COVID-19 policies and procedures.
- COVID-19 Vaccination Program
 - USC has implemented a vaccination program to protect the health and safety of the USC Community. All University faculty, staff, and students who are on-campus are strongly encouraged to receive the SARS-CoV-2 vaccine when they are eligible to be vaccinated. Employees and students who choose to not be vaccinated must affirmatively opt-out of the SARS-CoV-2 vaccination appropriately as defined in the <u>COVID-19 Vaccination Program</u>.

Additional COVID-19 resources are available on the following websites:

- <u>https://policy.usc.edu/covid-19-vaccination-program/</u>
- <u>https://ehs.usc.edu/welcome/covid-19-resource-center/</u>
- <u>https://we-are.usc.edu/</u>
- <u>https://employees.usc.edu/covid-19-employee-resources/</u>



USC will provide effective training and instruction that includes:

- USC's COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- How to participate in the identification and evaluation of COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- COVID-19 facts:
 - COVID-19 is an infectious disease that can be spread rapidly. Particles containing the virus can travel more than six feet, especially indoors.
 - 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.
- COVID-19 symptoms, the importance of COVID-19 testing, and self-quarantine when COVID-19 symptoms emerge.
- Particles containing the virus can travel more than six feet, especially indoors, so physical distancing, face coverings, increased ventilation indoors, and respiratory protection decrease the spread of COVID-19, but are most effective when used in combination.
- The importance of hand hygiene:
 - Frequent hand washing with soap and water for at least 20 seconds,
 - Use a hand sanitizer when there is no immediate access to a sink or hand washing facility.
 - Hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings:
 - Face coverings are not respiratory protective equipment.
 - Face coverings are intended to protect other individuals from the wearer of the face covering.
 - COVID-19 is an airborne disease. N95s and more protective respirators protect the users from airborne disease while face coverings primarily protect people around the user.
- Return to campus:
 - Mandatory 'Health, Hygiene and Safety Training' module in TrojanLearn must be completed. The module underscores the health and hygiene requirements for returning to campus and why it is important to be aware of how the virus spreads. Campus entrants will not be able to complete Trojan Check and secure a reservation without completing the training module.
- Vaccinations
 - "Fully vaccinated" means two weeks have passed following a second dose of a two-dose series (such as the Pfizer-BioNTech or Moderna vaccines) or a single dose of a single-dose series (such as the Johnson & Johnson vaccine).
 - Fully vaccinated students, faculty, and staff are not required to participate in surveillance testing (Pop Testing) to access campus or take part in on-campus activities. However, completing a Trojan Check is still required to visit campus.
 - Trojan Check requires surveillance testing until COVID-19 records are submitted and reviewed.

- USC employees who are not fully vaccinated have the right to request a respirator for voluntary use, without fear of retaliation and at no cost to employees. Whenever respirators are provided for voluntary for use during COVID-19, the employee will be trained to:
 - 1. Properly wear the respirator provided;
 - 2. Perform a seal check according to the manufacturer's instructions each time a respirator is worn, and the fact that facial hair interferes with a seal.



USC's reporting, recordkeeping, and access policy:

- Report information about COVID-19 cases and outbreaks at USC to the Los Angeles County Department of Public Health whenever required by law, and provide any related information.
- USC will report all information to the Los Angeles County Department of Public Health as required by Labor Code section 6409.6.
- Maintain records of the steps taken to implement the written COVID-19 Prevention Program.
- Maintain all records, including but not limited to training, inspections, hazard identification, etc.
- Make the written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and representatives of Cal/OSHA immediately upon request.
- Use 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.

13.0 Return-to-Work Criteria

Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to the workplace 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.
- Once a COVID-19 case has met the requirement of subsection (c)(10)(A) or (B), as applicable, a negative COVID-19 test will not be required for an employee to return to work.
- Persons who had a close contact may return to work per the following:
 - When 10 days have passed since the last known close contact and never developed any COVID-19 symptoms.
 - They have met the above requirements unless all of the following are true:
 - If they tested negative for COVID-19 using a polymerase chain reaction (PCR) COVID-19 test with specimen taken after the onset of symptoms; and
 - At least 10 days have passed since the last known close contact; and
 - They are symptom-free for at least 24 hours, without using fever-reducing medications.
- 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 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;
 - Emergency response workers who did not develop COVID-19 symptoms; and
 - Social service workers who did not develop COVID-19 symptoms and worked work face to face with clients in child welfare or assisted living.
- 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 when the order to isolate was effective, or 14 days from the time the order to quarantine was effective.
- If no violations of local or state health officer orders for isolation, quarantine, or exclusion would result, Cal/OSHA may, upon request, allow employees to return to work on the basis that the removal of an employee would create undue risk to a community's health and safety. In such cases, the employer shall develop, implement, and maintain effective control measures to prevent transmission in the workplace including providing isolation for the employee at the workplace and, if isolation is not feasible, the use of respirators in the workplace.

Appendix A Identification of COVID-19 Hazards

Unvaccinated and partially vaccinated persons will be considered potentially infectious regardless of their symptoms or negative COVID-19 test results. Pay particular attention 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 workplace exposure will be to all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. Close attention will be given to how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

As per campus reopening guidelines, buildings and operations have been evaluated by campus committees to determine essential functions to support the University.

Continuous safety improvement is encouraged by all employees, departments and schools. Appendix A Identification of COVID-19 Hazards worksheet can be used as a reference. Contact EH&S for assistance at EHS@usc.edu.



IDENTIFICATION OF COVID-19 HAZARDS

School/Department:						
Location (bldg., room):						
Person conducting evaluation:			Date created:			
Name(s) of Employee(s) and Aut	norized Employee	e Repre		ted		
1.			5.			
2.			6.			
3.			7.			
4.			8.			
Description Interaction, area, activity, work task, process, equipment, and material that potentially exposes employees to COVID-19 hazards	Place/Time	Potentic employe	tial for COVID-19 Exposure al for COVID-19 exposures and ees affected, including members of iblic and employees of other ers	COVID-19 Controls Existing and/or additional COVID-19 prevention controls, including barriers, partitions, and ventilation		
NOTES		1				



This form is used to review COVID-19 protocols in campus worksites. Continuous safety improvement is encouraged by all employees, departments and schools. Appendix B COVID-19 Inspections can be used as a reference. Contact EH&S for assistance at EHS@usc.edu.

USC University of Southern California

COVID-19 INSPECTIONS

Date created: ASSIGNED TO ASSIGNED TO ASSIGNED TO ASSIGNED TO	DATE CORRECTED
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Appendix C COVID-19 Case Investigation

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. Employee confidentiality in all COVID-19 testing or related medical services provided by USC will be secure with the exception of unredacted information on COVID-19 cases that will be provided immediately upon request to the LACDPH, 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 expressed 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.

USC conducts COVID-19 testing and contact tracing internally. The following procedures apply when a positive case is identified:

- USC Student Health Center (SHC) requires weekly Covid-19 tests for all unvaccinated faculty, staff, and graduate students. Fully vaccinated individuals are not required to test.
- SHC contact traces all individuals who have tested positive for COVID-19 on campus or notified USC via the COVID-19 hotline.
- The COVID-19 Cases Review Committee (SWAT) reviews all positive cases daily. The Review Committee is composed of USC stakeholders' representatives (e.g., Student Health, Legal, HR, Communications, and EH&S).
- Close contacts are identified and determined to be high or low risk of exposure. High-risk exposures are required to quarantine according to LACDPH. Low-risk exposure is required to self-monitor for any signs or symptoms.
- When three (3) or more positive cases are present in the same area, SHC communicates with LACDPH to report the outbreak. EH&S works together with LACDPH and supervisors to address any findings and/or recommendations.

Additionally, a written notice (or verbal communication) is dispatched within one business day to all employees and employee representatives at the worksite that may have had exposure to COVID-19 during the high-risk period. The notice will include the disinfection plan required by Labor Code section 6409.6(a)(4).

USC University of Southern California

COVID-19 CASE INVESTIGATION

Investigator:	Date created:		
Name(s) of Employee(s) that participated in investigation			
Name of Employee/Non-Employee ¹ :			
Occupation/Reason in workplace if non-employee:			
School/Department:			
Location (bldg., room):			
Date of investigation:	Was COVID-19 test offered? Yes 🗌 No 🗌		
Date/time COVID-19 case was last present in the workplac	e:		
Date of positive/negative test and/or diagnosis:			
Date COVID-19 case first had one or more COVID-19 symp	toms:		
Results of evaluation of COVID-19 case and all locations at 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):			
Date notice given of potential COVID-19 exposure (within one business day; personal identifying information of COVID-19 case not revealed):			
Employees who may have had COVID-19 exposure and their authorized representatives that were notified:			

¹ Non-employee refers to contractors, volunteers, etc. at USC. Inform employer of non-employee's COVID-19 status if applicable.

USC University of Southern California

COVID-19 CASE INVESTIGATION

Independent contractors/other employers present at workplace	e during high-risk exposure period that were notified:
What were workplace conditions that could have contributed to	o the risk of COVID-19 exposure?
What are be done to reduce any second to COVID 102	
What can be done to reduce exposure to COVID-19?	
LACDPH notified? Yes No C	Date:
NOTES	

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General Notification Sample Letter USC Student Health

Keck Medicine of USC

DATE

Dear USC Employees,

We are contacting you because we recently received information about a confirmed case of COVID-19 on NOTIFICATION DATE from an individual who works in LOCATION.

The individual was present on campus and was potentially infectious INFECTIOUS DATE.

Asymptomatic testing is available to you through the <u>surveillance "Pop Testing" program</u>. Locations for testing are on both USC campuses. Given community spread in Los Angeles, we expect that additional positive cases may be identified in our community.

Note: If you have previously tested positive for COVID-19 within the past 90 days, <u>you should not participate</u> <u>in testing</u>, as results may not correctly reflect your level of current infection. Monitor for symptoms, and if you develop any symptoms, contact your health provider.

Because your health and safety are important, please follow all guidelines listed below. If additional positive cases are identified, we will continue our practice of contact tracing and individually notifying all individuals deemed at high risk. This notice will serve as the on-going reminder to follow safe practices.

- Avoid any social gathering outside of your immediate household unit. Recent employee and student exposures and illness has been traced back to group gatherings.
- Take your break or meal periods alone. This is one of the riskiest activities for transmission. Please use safe distancing when eating, avoid eating in shared breakrooms if unable to maintain physical distancing, do not bring in food for sharing, do not use common serving utensils and serve individually packaged foods only (wrapped sandwiches, boxed lunches, bottled drinks).
- Wear a face covering at all times while you are outside of your residence and on all locations on campus.
- Practice physical distancing, maintaining a six-foot distance from others for classroom, workplace and personal interactions.
- Practice personal hand hygiene with frequent hand washing and use of hand sanitizer.
- Complete <u>Trojan Check</u> daily. All students, employees and visitors are required to complete a daily symptom check prior to entering facilities on our campuses and when residing on campus.
- Stay at home if you are sick. If you develop symptoms chills or fever of 100 degrees or higher; loss of taste or smell; muscle soreness or headaches or fatigue; cough or runny nose of sore throat or congestion; difficulty breathing or shortness of breath; conjunctivitis ("pinkeye," inflammation of the eye including redness, itching and tearing) along with feeling feverish; gastrointestinal symptoms (stomach upset, such as abdominal pain or diarrhea or nausea or vomiting). please begin self-isolation and contact your personal health care provider or Student Health at 213-740-9355 (WELL) to arrange for evaluation and testing.
- If you have recently traveled outside of California, self-monitor for symptoms and do not come to campus for 10 days. Testing after travel is recommended; see information related to asymptomatic surveillance testing.
- Stay at home if you have been exposed to someone with COVID-19. You must begin quarantine and make arrangements for testing through your personal health care provider or at USC Student Health by calling 213-740-9355.

USC Student Health

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• Any student or employee who tests positive for COVID-19 should notify USC by calling the hotline at 213-740-6291 or by emailing to <u>covid19@usc.edu</u>.

Your health is our top priority and we are continuing to ensure your health and safety with [enhanced deep cleaning and sanitization/alternative] of areas [including office / work station] and any common spaces at the Premises. [If you would like more information on the cleaning of buildings at USC, please visit the <u>Office of Environmental Health & Safety's website</u> where you can view a guide sheet on enhanced cleaning during COVID-19.

When a [student/employee/subcontractor etc.] that either tested positive or was presumed positive, is released to return on campus, the University will follow all Cal/OSHA, CDC, federal, state and local guidelines to maintain the health and well-being of all of our [students/employees/subcontractors], before returning a [students/employees/subcontractors] back to work. This includes but is not limited to the individual being in isolation for at least 10 days from the first sign of COVID-19 symptoms, and no fever within 24 hours prior to returning to work without the use of a fever reducing drug, and improvement of their symptoms.

If you are a current [employee/subcontractor] experiencing COVID-19 symptoms or you have been exposed to someone with COVID-19, with appropriate notice, you will not be disciplined for not coming into work. Your health is our top priority and we remain committed to providing a safe environment for all of our employees. As an employee of the University, you may be entitled to several different types of leave or benefits including the following:

- Workers' Compensation
- COVID-19 paid sick leave
- Supplemental Paid Sick Leave
- Disability Insurance
- Long Term Disability

You can learn more about the leaves/benefits you are entitled to on our COVID-19 website. For additional leaves/benefits information, you may also contact <u>your HR Partner</u>.

Please be advised that the University is committed to providing a safe and transparent community where discrimination, harassment, and retaliation are strictly prohibited. More information on the <u>University's anti-</u><u>discrimination and anti-retaliation policies</u> are available online.

The University will continue to review and reevaluate return to work procedures, in accordance with Cal/OSHA, CDC and federal, state and local health authorities.

Information about community spread of COVID-19 is available on our <u>COVID-19 website</u>. General questions can also be directed to the COVID-19 hotline at 213-740-6291 or emailed to <u>covid19@usc.edu</u>.

Dr. Sarah Van Orman	Dr. Mildred Wenger
Chief Health Officer	Co-Medical Director
USC Student Health	USC Student Health

[Department Head] [Title] [Division]

High Risk Notification Sample Letter

USC Student Health

Keck Medicine of USC

DATE

Dear Employee/Student,

We are contacting you because we recently received information about a confirmed case of COVID-19 on NOTIFICATION DATE from an individual who works in LOCATION.

The individual was present on campus and was potentially infectious from WORK DATE(S). As a result, you have already been advised to get tested for COVID-19 at Student Health. Please begin self-isolation, and do not report to work, attend class or any campus activities.

Follow the directions below for the next 14 days: http://publichealth.lacounty.gov/acd/ncorona2019/covidquarantine/

"90 Days" Note: If you have previously tested positive for COVID-19 within the past 90 days, <u>you</u> <u>should not participate in testing</u>, as results may not correctly reflect your level of current infection. Monitor for symptoms, and if you develop any symptoms, contact your health provider.

COVID-19 vaccine recipients: If you have completed both doses of the COVID-19 vaccine and more than 14 days but less than 90 days have passed since your second dose, you do not have to quarantine. Monitor for symptoms, and if you develop any symptoms, contact your health provider.

If you are a USC student and unable to self-isolate at home, the university can assist you with accommodations.

Employees may access the university's isolation accommodations; costs are the responsibility of the employee except in cases where transmission is due to a workplace exposure. 213-740-6291 or by email to covid19@usc.edu.

Information about community spread of COVID-19 is available on our COVID-19 website. General questions also can be directed to the COVID-19 hotline at 213-740-6291 or emailed to covid19@usc.edu.

Dr. Sarah Van Orman	Dr. Mildred Wenger	[NAME]
Chief Health Officer	Co-Medical Director	[TITLE]
USC Student Health	USC Student Health	[DIVISION/SCHOOL]

Low Risk Notification Sample Letter USC Student Health

Keck Medicine of USC

DATE

Dear USC Employees and Students,

We are contacting you because we recently received information about a confirmed case of COVID-19 on NOTIFICATION DATE from an individual who works in LOCATION.

The individual was present on campus and was potentially infectious WORK DATE(s).

We are notifying you as a precaution and your exposure is considered **low-risk**. Consistent with current public health guidelines related to potential brief exposures, active self-monitoring for symptoms is recommended as follows:

- You may continue to work.
- For 14 days, you are requested to take your temperature two times a day (every 12 hours) and monitor for the following symptoms: chills or fever of 100 degrees or higher; loss of taste or smell; muscle soreness or headaches or fatigue; cough or runny nose of sore throat or congestion; difficulty breathing or shortness of breath; conjunctivitis ("pinkeye," inflammation of the eye including redness, itching and tearing) along with feeling feverish; gastrointestinal symptoms (stomach upset, such as abdominal pain or diarrhea or nausea or vomiting).
- If you develop any symptoms, please begin self-isolation. Notify your supervisor and contact your personal health care provider or Student Health at 213-740-9355 to arrange for testing and further evaluation.
- Asymptomatic testing is also available to you through the <u>surveillance "Pop Testing" program</u>. Locations for testing are on both USC campuses.

Note: If you have previously tested positive for COVID-19 within the past 90 days, <u>you should not</u> <u>participate in testing</u>, as results may not correctly reflect your level of current infection. Monitor for symptoms, and if you develop any symptoms, contact your health provider.

This notification is also made to reinforce awareness of the nature of community spread of COVID-19 and the importance of the following health and safety practices:

- Avoid any social gathering outside of your immediate household unit. Recent exposures and illness have been traced back to group gatherings.
- Take your break or meal periods alone. This is one of the riskiest activities for transmission. Please use safe distancing when eating, avoid eating in shared breakrooms if unable to maintain physical distancing, do not bring in food for sharing, do not use common serving utensils and serve individually packaged foods only (wrapped sandwiches, boxed lunches, bottled drinks).
- Wear a face covering at all times while you are outside of your residence and on all locations on campus.
- Practice physical distancing, maintaining a six-foot distance from others for classroom, workplace and personal interactions.

USC Student Health

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- Practice personal hand hygiene with hand washing and frequent use of hand sanitizer.
- Complete <u>Trojan Check</u> daily. All students, employees, and visitors are required to complete a daily symptom check prior to entering facilities on our campuses and when residing on campus. Because you are low risk, you may indicate "no" when asked if you have been exposed.
- If you have recently traveled outside of California, self-monitor for symptoms and **do not come to campus** for 10 days. Testing after travel is recommended; see information related to asymptomatic surveillance testing.
- A student or employee who tests positive for COVID-19 should notify USC by calling the hotline at 213-740-6291 or by emailing covid19@usc.edu. If you are a current [employee/subcontractor] experiencing COVID-19 symptoms or have been exposed to someone with COVID-19, with appropriate notice, you will not be disciplined for not coming into work. Your health is our top priority and we remain committed to providing a safe environment for all of our employees. As an employee of the University, you may be entitled to several different types of leave or benefits including the following:
 - o Workers' Compensation
 - COVID-19 paid sick leave
 - Supplemental Paid Sick Leave
 - Disability Insurance
 - Long Term Disability

You can learn more about the leaves/benefits you are entitled to on our COVID-19 website. For additional leaves/benefits information, you may also contact <u>your HR Partner</u>.

Please be advised that the University is committed to providing a safe and transparent community where discrimination, harassment, and retaliation are strictly prohibited. More information on the <u>University's anti-discrimination and anti-retaliation policies</u> are available online.

If you would like more information on the cleaning of buildings at USC, please visit the <u>Office of</u> <u>Environmental Health & Safety's website</u> where you can view a guide sheet on enhanced cleaning during COVID-19.

Information about community spread of COVID-19 is available on our <u>COVID-19 website</u>. General questions also can be directed to the COVID-19 hotline at 213-740-6291 or emailed to <u>covid19@usc.edu</u>.

Dr. Sarah Van Orman	Dr. Mildred Wenger	[NAME]
Chief Health Officer	Co-Medical Director	[TITLE]
USC Student Health	USC Student Health	[DIVISION/SCHOOL]

Union Notification Sample Letter USC Student Health

Keck Medicine of USC

DATE

Dear [Name of Union Rep],

[If an union employee was exposed inset:] [We are contacting you because we received information on [NOTIFICATION DATE] about a confirmed case of COVID-19 from an individual that is a member of the bargaining unit you represent and in the job classification of [INSERT], who works in [LOCATION]. The individual was present and potentially infectious from [WORK DATE(S)]. The individual is currently in self-isolation off-campus and is doing well. We have contacted all individuals who were exposed to this person. We are providing you this notice as a legal requirement under Labor Code 6409.6.]

[Or, if the positive case is not a bargaining member, insert:] [This notice is to inform you that an individual working at [name of location] ("the Premises"), in the job classification of [insert], has received a positive diagnosis of COVID-19. The individual was last on the Premises on [date], which falls within the individual's infectious period.

Based on our investigation, members of the bargaining unit you represent may have been on the Premises at the same time as the positive COVID 19 Case. As part of our investigation, we do not believe members of the bargaining unit were in close or direct contact with this individual, however, we are providing you this notice as a legal requirement under Labor Code 6409.6. The COVID-19 positive case went home on [DATE] and has not been on University's property since that time. The individual remains in quarantine and we are supporting them as they recover.]

We have separately notified all individuals that were in close or direct contact with this COVID-19 case. Close contact is defined as being within 6 feet of a COVID-19 case for more than 15 cumulative minutes in a 24-hour period during the two days prior to the COVID-19 case's onset of symptoms and/or positive test results.

[If after contact tracing you determine that bargaining unit members were in close contact, add the following paragraphs here: Based on the University's investigation, we believe that member(s) of the bargaining unit you represent, in the job classification(s) of [insert], may have had close contact with the COVID-19 individual, on or about [insert date(s)]. Based on University policy, we have directed these unit members to not report to work (i.e., self-quarantine) until, at least, [10 days from last close contact].

We have encouraged the unit members to seek medical advice. Additionally, we have offered the unit members the ability to obtain a test, at the University's expense, through [insert testing details].

Unit members that do not test positive for COVID-19, are not diagnosed positive, or are not experiencing symptoms by [10 days from last close contact], may return to work after certifying they are fit to return to work and if appropriate for their job role. They must continue to closely monitor their health for days 11-14 and strictly follow all guidelines for physical distancing. Employees whose jobs require close physical proximity to others may not return until 14 days after their last close contact.

Our employee's health is our top priority and we are continuing to ensure their health and safety with

USC Student Health

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[enhanced deep cleaning and sanitization/alternative] of areas [including office / work station] and any common spaces at the Premises. If you would like more information on the cleaning of buildings at USC, please visit the <u>Office of Environmental Health & Safety's website</u> where you can view a guide sheet on enhanced cleaning during COVID-19.

When a [student/employee/subcontractor etc.] that either tested positive or was presumed positive, is released to return on campus, the University will follow all Cal/OSHA, CDC, federal, state and local guidelines to maintain the health and well-being of all of our [students/employees/subcontractors], before returning a [students/employees/subcontractors] back to work. This includes but is not limited to the individual being in isolation for at least 10 days from the first sign of COVID-19 symptoms or date of a positive test if they are asymptomatic, and no fever within 24 hours prior to returning to work without the use of a fever reducing drug, and confirmation that their symptoms have improved.

If any employee is experiencing COVID-19 symptoms, such as a fever of 100.4 degrees Fahrenheit or higher, chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, congestion or runny nose, nausea or vomiting, or diarrhea, they are directed to stay home and seek medical attention. Any employee experiencing COVID-19 symptoms or who have been exposed to COVID-19, with appropriate notice, will not be disciplined for not coming into work. Our employee's health is our top priority and we remain committed to providing a safe environment for all of our employees.

Bargaining unit members may be entitled to several different types of leave or benefits including the following:

- Workers' Compensation
- COVID-19 paid sick leave
- Supplemental Paid Sick Leave
- Disability Insurance
- Long Term Disability

More information about the leaves/benefits our employees are entitled to are on our <u>COVID-19</u> website. For additional leaves/benefits information, you may also contact the relevant <u>HR Partner</u>.

Please be advised that the University is committed to providing a safe and transparent community where discrimination, harassment, and retaliation are strictly prohibited. More information on the University's <u>anti-discrimination and anti-retaliation policies</u> are available online.

The University will continue to review and reevaluate return to work procedures, in accordance with Cal/OSHA, CDC and federal, state and local health authorities. Information about community spread of COVID-19 is available on our <u>COVID-19 website</u>. General questions can also be directed to the COVID-19 hotline at 213-740-6291 or emailed to <u>covid19@usc.edu</u>.

Dr. Sarah Van Orman	Dr. Mildred Wenger	[NAME]
Chief Health Officer	Co-Medical Director	[TITLE]
USC Student Health	USC Student Health	[DIVISION/SCHOOL]



Training rosters/records will be maintained by Trojan Learn for employees who complete Health, Hygiene and Safety Training module. Additional training requirements will be maintained by individual departments.

Use the <u>Site-Specific Training Record form</u> to log additional training and attendees.



Office of Environmental Health and Safety

(323) 442-2200 <u>ehs@usc.edu</u>