California Institute of Technology

COVID-19 PREVENTION PROGAM

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Table of Content

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 be inhaled or land in the nose, mouth, or eyes of someone nearby and cause illness. COVID-19 is also considered airborne, meaning small particles of infectious virus remain suspended in the air and can infect people hours after the sick person has left the area.

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 (6) 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

The California Institute of Technology (Caltech) is committed to protecting our employees and preventing the spread of COVID-19 in the workplace. Cal/OSHA requires all California employers to protect employees from the coronavirus in the workplace by either having a COVID-19 Prevention Program (CPP) or addressing the COVID-19 hazard in their Injury and Illness Prevention Program (IIPP). Accordingly, this program has been designed to reduce Caltech's workers' risk of catching and spreading this virus.

Caltech encourages employees to share information about potential COVID-19 hazards at their workplace and assists in evaluating these hazards. Caltech investigates all workplace illnesses and corrects hazards that are identified. Caltech makes every efforts to stay informed on the virus presence in our community and follows recommendations made by national and local health agencies, including guidance from the Pasadena Public Health Department and the California Department of Public Health (CDPH). Caltech regularly reviews the latest regulations and guidance and will update this plan as necessary.

This Program does not apply to:

- Work locations where there is only one employee who does not have contact with other people.

- Employees who are working from home.

- Employees who are covered by the Aerosol Transmissible Diseases regulation (Cal. Code Regs., tit. 8, § 5199) (section 5199).

ROLES AND RESPONSIBILITIES

Environmental Health and Safety Office

The EH&S Office is responsible for:
- Maintaining the written CPP and updating as necessary, in accordance with the latest regulations and guidance.
- In consultation with Health Center Medical Director and/or Padadena Public Health Department, identifying workplaces and tasks that present a higher risk of COVID-19 transmission.
- Reporting work-related severe illness (hospitalization) and major outbreaks to Cal/OSHA, in accordance with the outbreak definition in Section 3205.1.

COVID Response Team for Employees

The COVID Response Team for Employees is an interdisciplinary effort with core members, supplemented by additional members as needed, depending on the teams, departments, or facilities impacted and depending on the scale of the response needed.

- Student Wellness Services is a core member responsible for:
  - Receiving reports from employees who test positive or are diagnosed with COVID-19 infection.
  - Investigating reported COVID-19 cases in the workplace to determine if an outbreak exists and documenting these efforts.
  - Notifying close contact exposed employees of the exposure recommendations for testing and mitigation controls.
  - Notifying senior leadership of case clusters in affected departments, enabling them to implement their departments mitigation plans (eg, masking, work from home) and activate business contingency plans as needed.
  - Collaborates on the Return-to-work process and management of workplace outbreak (in accordance with the outbreak definition in Section 3205.1) including communication and documentation.
    - SWS provides recommendations for testing and control mitigation plans for workplace outbreaks (in accordance with the outbreak definition in Section 3205.1).
  - Serving as a liaison with Pasadena Public Health Department in the event of a large outbreak.
  - Maintaining and updating the COVID-19 Dashboard with information on employee clusters and cases on campus.
  - Providing testing for employees identified as close contacts or members of an exposed group during an outbreak.
  - Maintaining individual records of all reported employees COVID19 illnesses.

- Other members of the response team will be involved dependent on factors such as severity of infectious spread or cluster, affected campus population, community levels of transmission and may include Strategic Communications, Employees Organization and Development, Disability and Leave Unit, the Division Operating Officers, Emergency Preparedness and EH&S. Together with Student Wellness Services, they will implement response steps as required by State and local regulations to mitigate COVID illness at the workplace.

- Additional personnel involved in the response may include leadership of the impacted departments, senior campus leadership, and / or consultants as needed to manage outbreaks on campus.

Managers and Supervisors

Managers and supervisors are responsible for:
- Supporting the Implementation of this plan in their assigned work areas and ensuring employees' questions are answered in a language they understand.
- Inspecting periodically their assigned work area and checking that controls are in place, including that face coverings are worn when required.
- Encouraging their staff to report COVID status and stay home if they have symptoms of any respiratory diseases.

All Caltech employees

- All Caltech employees are required to follow the policies and procedures laid out in this plan, use safe work practices, and assist in maintaining a safe work environment.
- All Caltech employees are encouraged to report COVID-19 positive tests.

IDENTIFICATION AND EVALUATION OF COVID-19 HAZARDS

Caltech considers all persons to be infectious, regardless of symptoms, vaccination status, or negative COVID-19 test and periodically evaluate our workplace and operations to identify tasks that may pose a risk of COVID-19 exposure. The evaluation includes all interactions, areas, activities, processes, equipment, and materials that could present potential exposure to COVID-19. Assessments include employee interactions with all persons who may be present in the workplace: co-workers, contractors, vendors, customers, and members of the public. Evaluations include:

- Treatment of COVID-19 as an airborne transmissible disease.

- Identification of places and times when people may gather or come in contact with each other for 15 minutes or more, even if they aren't working. Examples: laboratory, classrooms, meetings, training, workplace entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting rooms.

- Employees' potential workplace exposure to all persons at the workplace. Caltech will consider how employees and others enter, leave, and travel through the workplace, in addition to addressing stationary work. Examples: co-workers, employees of other businesses, the public, customers or clients, and independent contractors.

- Existing COVID-19 prevention measures and whether different or additional control measures are needed.

The jobs/tasks/activities at Caltech have been assessed as follows:

Table 1 – Risk Assessment

Job Title or Task	Description of Exposure Risk
Caltech Dining Services/Athenaeum/Bookstore/Athletics	Close contact with numerous people including members of the public
Caltech Teaching Staff (Faculty, TA)	Extended period of time in close contact with others (classrooms)
Student Affairs (Staff interacting with students, Residential Life Coordinator)	Extended period of time in close contact with others
Facilities Shops	Dispatch through all campus for maintenance work – interaction with high number of people.
Caltech Laboratories	Extended period of time in close contact with others within a given group
Administrative Offices (HR, EH&S, procurement, etc.)	Extended period of time in close contact with others withing a given group

MITIGATION OF COVID-19 HAZARDS

Caltech will treat all persons, regardless of symptoms, vaccination status, or negative test results, as potentially infectious. Caltech selects and implements feasible control measures to minimize or eliminate employee exposure to COVID-19. Caltech reviews orders and guidance on COVID-19 hazards and prevention from the State of California and the local health department, including general information and information specific to our industry, location, and operations. Caltech corrects 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
Caltech Dining Services/Athenaeum/Bookstore/Athletics	Maximized outdoor air	face coverings allowed and recommended	N95 allowed under voluntary use
Caltech Teaching Staff (Faculty, TA)	Maximized outdoor air	face coverings allowed and recommended	N95 allowed under voluntary use
Student Affairs (Staff interacting with students, Residential Life Coordinator)	Maximized outdoor air	face coverings allowed and recommended	N95 allowed under voluntary use
Facilities Shops	Maximized outdoor air	face coverings allowed and recommended	N95 allowed under voluntary use
Caltech Laboratories	Maximized outdoor air	face coverings allowed and recommended	N95 allowed under voluntary use
Administrative Offices (HR, EH&S, procurement, etc.)	Maximized outdoor air	face coverings allowed and recommended	N95 allowed under voluntary use

Managers and supervisors inspect their workplace periodically to check that controls are effective, to identify unhealthy work conditions or practices, and to ensure compliance with this plan. Any deficiencies must be corrected right away.

Engineering Controls – Equipment and Building Systems to Minimize Exposures

Caltech's engineering controls for COVID-19 include:

Ventilation – Caltech operates and maintains all workplace building ventilation systems, in accordance with Cal/OSHA Section 3205, 5142 and 5143 when applicable. In addition, Caltech will follow guidance from The California Department of Public Health (CDPH)

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

Caltech's administrative controls for COVID-19 are:

Face Covering: Caltech will provide face coverings (in accordance with section 3205) to all employees, and managers and supervisors will ensure they are worn by all employees when required by a Pasadena Public Health or CDPH regulation or order or if required when returning to work within 10 days of a COVID-19 infection (see Return to Work section below).

Caltech doesn't prevent any employee from wearing a face covering, including voluntary use of a filtering face piece respirator (such as a disposable N95), unless it would create a safety hazard, such as interfering with the safe operation of equipment. **Face coverings are not respiratory protection against hazardous chemicals or dusts.**

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

1. When an employee is alone in a room or vehicle.

2. While eating or drinking at the workplace, provided employees are at least six feet apart and outside or filtered air supply to the area has been maximized to the extent feasible.

3. When employees are required to wear respirators and in accordance with T8CCR Section 5144.

4. When employees cannot wear face coverings due to a medical or mental health condition or disability. This includes a hearing-impaired person or someone using sign language to communicate. Employees

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.

5. 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.

Situations where employees are not wearing a face covering or face shield with drape, under exceptions 4 or 5 above, will be further investigated to assess COVID-19 hazards and to identify additional actions which will minimize employee exposure.

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

In general, employees are not required to use respirators at Caltech for protection from COVID-19. If a hazard assessment determines respirators are needed, they will be used in accordance with T8CCR Section 5144.

Disposable N95 respirators for voluntary use will be provided upon request in the following situations:

- For all employees working indoors or in vehicles with more than one person.

When respirators are provided for voluntary use, Caltech will encourage their use, provide the correct size, provide training material so employees know how to properly wear the respirator and perform a user seal check, and ensure use is in compliance with T8CCR Subsection 5144(c)(2), which includes determining that respirator use will not in itself create a hazard and providing employees with training on Appendix D to Section 5144. Instructions on proper respirator use will include the fact that facial hair interferes with the respirator's seal to the face and may not provide the expected level of protection.

COVID-19 Testing

COVID testing is no longer a requirement at Caltech, though it is recommended to test for COVID in various circumstances.

Caltech makes COVID-19 testing available at no cost and during paid time to:
- **Employees who have close contact with a COVID-19 case in the workplace.**
- **Employees who have been identified within an exposed group during an outbreak.**

Caltech is not required to make COVID-19 testing available to returned cases. A returned case has met the return-to-work criteria outlined in this program and has not developed any COVID-19 symptoms since returning. The returned case designation is set by CDPH.

Employers provided COVID-19 tests must meet all of the following requirements:

- Be cleared, approved, or authorized, including in an Emergency Use Authorization (EUA), by the Food and Drug Administration (FDA) to detect current infection with the SARS-CoV-2 virus; and

- Be administered in accordance with the authorized instructions.

ADRESSING COVID-19 CASES IN THE WORKPLACE

Investigating Illness at the Workplace

Caltech investigates all COVID-19 cases in the workplace when they are reported. Investigation will include determining the day and time the COVID-19 case was last present at the workplace and, to the extent feasible, when the COVID-19 case tested positive or was diagnosed, and the date the COVID-19 cases first experienced symptoms if present.

Caltech encourages employees to report COVID-19 symptoms, positive COVID test results and stay home when ill.

Exclusion from the Workplace

To limit transmission in the workplace, COVID-19 cases (symptomatic or positive) will be excluded from the workplace until the Return-to-Work criteria are met. Information on available benefits under legally mandated sick leave, workers' compensation law, local government requirements, and Caltech's leave policies will be provided at the time of exclusion.

Employees that have had close contact with a COVID-19 case will follow instruction from the COVID Response Team for Employees, in accordance with the current Pasadena Public Health and CDPH guidance for close contacts. Depending on circumstances, current transmission level and affected groups, instructions upon being identified as close contact may vary.

Return to Work

Criteria for returning to work after positive test/diagnosis for COVID-19 or being excluded during an outbreak (see Appendix A and B of this plan) will be determined and communicated by the COVID Response Team for Employees:

1. COVID-19 cases who do not develop symptoms can return to work when cleared by the COVID response Team for Employees and will be **required** to wear a face covering in the workplace until 10 days have passed since the date symptoms began or for cases without symptoms, their first positive test was collected.

2. COVID-19 cases who develop symptoms can return when symptoms have cleared (no fever for 24 hours) and when cleared by the COVID response Team for Employees and will be **required** to wear a face covering in the workplace until 10 days have passed since the date symptoms began or for cases without symptoms, their first positive test was collected.

Regardless of vaccinations status, previous infection, or lack of COVID-19 symptoms, a COVID-19 case will be required to wear a face covering in the workplace until 10 days have passed since the date symptoms began or for cases without symptoms, their first positive test was collected.

These requirements will apply regardless of whether an employee was previously excluded, or other precautions were taken in response to an employee's close contact or membership in an exposed group.

In addition:

-   If an order to isolate, quarantine, or exclude 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 over or the order is lifted.

-   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.

Notification

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

1. Notify employees, independent contractors, and any other employer employees who have a close contact in accordance with section 3205(e)(1). Unless otherwise defined by CDPH, close contact means:

    a. In indoor spaces of 400,000 ft^3 or fewer per floor, sharing the same indoor airspace as a COVID-19 case for a cumulative total of 15 minutes or more over a 24-hour period during the COVID-19 case's infectious period, regardless of use of face coverings.

    b. In indoor spaces greater than 400,000 ft^3 per floor, being within six (6) feet a COVID-19 case for a cumulative total of 15 minutes or more over a 24-hour period during the COVID-19 case's infectious period, regardless of use of face coverings.

REPORTING, RECORDKEEPING, AND ACCESS

Reporting

Cal/OSHA Recording/Reporting Caltech will record on our 300 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.

Caltech will report any serious work-related 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

Caltech maintains records of the steps taken to implement this written program. These records include but are not limited to training, inspections, and hazard identification; these records will be retained for at least as stated in section 3205 (through Feb 3, 2026).

Caltech keeps a record of and tracks all COVID-19 cases. These records will be retained for at least two (2) years and include the employee's:

- Name
- Contact information
- Occupation
- Location where the employee worked
- Date of the last day at the workplace
- Date of positive COVID-19 test or diagnosis

Caltech keeps records of all employee and contractor notifications of COVID-19 close contacts in accordance with section 3205.

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

Access

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

EMPLOYEE TRAINING

Caltech provides all employees training in accordance with the IIPP requirements (section 3203 (a) (7) and instruction on COVID-19 illness, exposure control methods and policies in place at Caltech are designed to include the following information:

- Information on COVID-19 hazards:
    - How it spreads, including airborne and asymptomatic transmission.
    - The fact that viral particles can travel more than 6 feet, especially indoors, so increased ventilation, physical distancing, and face coverings can decrease the spread of COVID-19, but are most effective when used in combination.
    - Symptoms of COVID-19.
    - Risk of exposure to COVID-19 on the job.

- Control measures to protect employees from exposure and infection:

  - Requiring employees to stay home when sick.

  - Conditions that require the use of face covering at the workplace, and how to request face coverings at the workplace.

  - Proper use of a face covering 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.

  - Covering coughs and sneezes.

- Policies for providing respirators and the right of employees to request a respirator for voluntary use. When respirators are provided for voluntary use:

  - How to properly wear the respirator provided, and

  - How to perform a user seal check each time the respirator is donned, and

  - Facial hair can interfere with the seal of the respirator and reduce the amount of protection provided.

- Information on COVID-19-related leave benefits available under legally mandated sick leave, if applicable, workers' compensation law, local governmental requirements, Caltech's leave policies, and leave guaranteed by contract.

- The contents of this Plan.

APPENDIX A - COVID-19 OUTBREAKS

The following procedures will be followed in addition to Caltech's CPP whenever **three (3) or more employee COVID-19 cases within an exposed group** (as defined in [section 3205(b)](#)) have visited the workplace during their infectious period within a 14-day period or when the number of cases at the worksite meets another definition of outbreak as defined by Pasadena Public Health or CDPH regulation or order. These procedures can be stopped when one or fewer new COVID-19 cases are detected in the exposed group for a 14-day period.

Testing

Caltech will make testing available to employees within the exposed work group, regardless of vaccination status, at no cost during working hours except for:

- Employees not present during the 14-day outbreak period defined above.

Testing will be made available immediately after determination of an outbreak, and then on a weekly basis to all employees in the exposed group who remain at the workplace.

Employees in an exposed group (identified as close contact or not) will be given instructions by the COVID Response Team for Employees on the recommendations and requirements for their safe operation at the workplace.

Additional Controls to Mitigate COVID-19 Hazards

In addition to the controls listed in the CPP, Caltech's COVID Response Team for Employees will do the following:

- Require employees in the exposed group to wear face coverings when indoors, or when outdoors and less than 6 feet from another person unless one of the exceptions to face coverings listed in our CPP applies. This requirement will apply regardless of vaccination status.
- Notify employees in the exposed group that they can request a respirator for voluntary use.
- In buildings or structures with mechanical ventilation, Caltech 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, Caltech will use filters with the highest compatible filtration rating. Caltech will use HEPA filtration units in indoor areas occupied by employees for extended periods where ventilation is inadequate to reduce the risk of COVID-19 transmission.

Workplace Investigation, Review, and Hazard Correction

Caltech COVID Response Team for Employees will investigate all workplace illness to determine potential factors in the workplace that could have contributed to the COVID-19 outbreak. Additionally, the team will review our relevant COVID-19 policies, procedures, and controls and implement changes needed to prevent further virus spread.

All investigations and reviews will be documented to include:

- Investigation of new or unabated COVID-19 hazards.
- Review leave policies and practices, including whether employees are discouraged from staying home when sick.
- Review 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. Caltech will make changes based on investigations and reviews to reduce the spread of COVID-19. This will include considering such actions as moving work tasks outdoors, allowing

employees to work remotely, increasing outdoor air supply to our indoor workplaces, 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 T8CCR Section 5144, or other applicable control measures.

APPENDIX B – MAJOR COVID-19 OUTBREAKS

The following procedures will be followed in addition to Caltech CPP and Appendix A – COVID-19 Outbreaks, **whenever 20 or more employee COVID-19 cases within an exposed group** (as defined in section 3205(b)) have visited our workplace during their infectious period within a 30-day period. These procedures can be stopped when one or fewer new COVID-19 cases are detected in the exposed group for a 14-day period.

In case of a major outbreak, Caltech will partner with Pasadena Public Health Department to isolate and respond appropriately and prevent further spread of infection.

Testing

Caltech will continue to provide testing as described in Appendix A of our CPP except that testing **may become required** of all employees in the exposed group, regardless of vaccination status, twice a week or more frequently as recommended by the Pasadena Public Health. Management of Employees in the exposed group will be done in accordance with Pasadena Public Health Department recommendations.

Reporting

Caltech will report major outbreaks to Cal/OSHA.

Additional Controls to Correct COVID-19 Hazards

In addition to the controls listed in the CPP and Appendix A, Caltech, in consultation with Pasadena Public Health may do the following:

- Provide respirators for voluntary use (such as a disposable N95) to employees in the exposed group, encourage use, and provide training in their use. Voluntary use of respirators will be according to T8CCR Section 5144(c)(2).

- Any employee in the exposed work group not wearing a respirator required by Caltech in compliance with section 5144 will be separated from other people by at least six (6) feet except when demonstrated to not be feasible or when they are momentarily closer than six (6) feet during movement. When it is not feasible to maintain six (6) feet of distance, individuals will be as far apart as feasible. Possible methods for physical distancing include:

    o Reducing the number of persons in an area at one time (including visitors)

    o Visual cues such as signs and floor markings to show employee locations and paths of travel

    o Staggered arrival, departure, work, and break times

    o Adjusted work processes (such as reducing production speed) to allow greater distance between employees

    o Telework or other remote work arrangement