## Summary

The University of California, Irvine’s COVID Prevention Plan addresses the Cal/OSHA emergency COVID-19 Prevention Regulation, 8CCR 3203.

### 1. Identification and correction of COVID-19 hazards

The campus identifies and evaluates COVID-19 hazards and correction of hazards by conducting periodic COVID-19 related inspections. EHS staff perform COVID-19 related spot checks in research spaces where hazardous chemicals are used, University Lab Animal Research (ULAR) locations, Facilities Management (FM), Design and Construction Services (D&CS), contractors/vendor construction work, Dining Services, and Student Housing units. Campus bargaining units and unions have been notified of EHS efforts to identify COVID hazards through HR communications. Data is collected on the results of the COVID-19 spot checks and presented to management and Senior Leadership.

EHS also follows-up on submitted COVID-19 safety concerns from campus, including COVID-19 related whistleblower complaints. Leadership of these units are notified of hazards and unsafe behaviors and expected to resolve them by communication to unit employees. Repeated COVID-19 safety concerns are elevated to campus Senior Leadership.

Campus units working on campus during the first 16 months of the COVID-19 pandemic have submitted Return to Work plans and completed a Risk Assessment, Protection, and Monitoring Plan. The submitted plan included a physical assessment of the workspace performed by EHS. Non-Research plans were submitted to the Campus Recovery Implementation Team (CRIT) for approval. Research plans were submitted to the Office of Research for approval. Starting July 1, 2021, units are instructed to complete a COVID-19 Prevention Checklist, reviewing all of the information with their staff, and attesting to following COVID-19 control measures, taking COVID-19 Returning to Campus training, COVID-related information contained on the UCI Forward website, and all current campus Executive Directives.

In addition to following the regulations set forth by Cal/OSHA, UCI frequently consults other regulatory agencies (i.e., California Department of Public Health (CDPH), Centers for Disease Control (CDC), Orange County Health Care Authority (OCHCA)) for changes and guidance on COVID-19 related information. UCI
also references the California State Guidance for Institutes of Higher Education document for additional information.

2. Investigation of COVID-19 positive cases, including communication to potentially exposed employees

Investigation of COVID-19 cases at UCI, including giving notice to all potentially exposed employees within one business day to meet compliance with AB 685, follows the following process:

Positive or suspected COVID-19 case notifies UCI in one of several methods:

   a. Through Human Resources, form available at: UCI Human Resources
   b. By contacting the COVID-19 Response Center at covid19@uci.edu or (949) 824-9918
   c. By notifying their supervisor of their status

After the form is completed by the employee, their supervisor, or HR on behalf of the employee, notification is sent to the Center of Occupational and Environmental Health (COEH), Contact Tracing, and EHS (safety@uci.edu).

Student employees are directed to visit the Student Patient Portal and complete the "COVID-19 Responder Screening Request," or contact UCI’s Student Health Center (SHC) at 949-824-3870 to report a case.

EHS assigns the positive case to an EHS representative for investigation, who determines and recommends control measures that should be taken in the workplace. Investigation questions are completed by EHS staff:

   Employee Name:
   Title:
   Email:
   Department:
   Supervisor Name:
   Supervisor Email:
   Supervisor Phone:

   Essential Worker: Critical worker identified under the department’s continuity of operations plan whose work cannot be completed remotely for any duration of their work hours.
   ☐ Yes
   ☐ No

   Represented Worker
   ☐ Yes
   ☐ No

   Case Last Day On-Site:
   Date of Onset:
   Description of Incident:
   Potential Route of Exposure:
   Supervisor Response:

   Check all control measures in place:
   • Physical Distancing
   • Signage
   • Communications
- Barrier/Space Assessment
- Training
- Face Covering
- Other

Covid-19 Returning to Campus Training
- Yes
- No

EHS Recommendations
- Physical Distancing
- Signage
- Communications
- Barrier/Space Assessment
- Training
- Face Covering
- Other

UCI Contact Tracing follows the attached flowchart after being notified of a positive COVID-19 case:

Written notification, required from the positive COVID-19 case which resulted in COVID-19 exposed workplace(s), applies to all campus non-healthcare workers including students, staff, faculty/academics, and employers of contractors is via UCI Campus’s COVID-19 web page, UCI Forward. This information is communicated to all UCI employees through a daily digest email, sent out Monday through Friday. As a result of contact tracing investigations, Contact Tracing provides a list of exposed workplaces to Strategic Communications and maintains records for five years, according to UCOP policy.
The daily email message from Strategic Communications includes the following information:

- A list of exposed workplaces (i.e., work locations)
- A statement that any employee who may have had a COVID-19 exposure was contacted by Contact Tracing, and if they did not receive it, then they should not be concerned.
- Links to employee COVID-19 benefits and campus disinfection protocols

Individual employee and union (if applicable) written notification for anyone who may have had a COVID-19 exposure applies to all campus employees. Communication is in the form of a written letter to employees deemed as having close contact to a positive COVID-19 case. As a result of contact tracing case investigation, Contact Tracing provides information (employee names, UCInetIDs, case number (if available), date of exposure, and work locations of exposure) for employees who had a potential COVID-19 exposure to Employee Workforce Relations. Contact Tracing will maintain these records for five years based on UCOP policy.

Employee Workforce Relations drafts a letter that includes the employee’s payroll title and migrates Contact Tracing’s information into the email. The document will also include the reason for testing, possible consequences of the test, decontamination process, benefits, and helpful information and resources.

Employee Workforce Relations uses an email letter template (i.e., C19 AB 685 Individual Employee Exposure Email) to add the employee’s Payroll Title and migrate Contact Tracing’s information into the email. The document will also include reasons for testing, possible consequences of the test, decontamination process, benefits, and helpful information and resources.

Employee Workforce Relations will also determine if the employee is represented, email the employee, and copy the union representative, if applicable. If an email address is not provided, Employee Workforce Relations will manage the case by exception. Employee Workforce Relations will maintain these records for five years, based on UCOP policy. Contract Tracing will use the process above for any employee who tests positive.

**Contractor/Vendors Communication:**

All contractors/vendors are notified via email about UCI’s dashboard which contains locations where there may be a potential COVID-19 exposure. EHS sends the following email out to all contractors/vendors Monday through Friday (business days):

Dear Contractor/Vendor providing services to UCI:

Per California Assembly Bill (AB) 685, effective January 1, 2021, please see the following information on potential COVID-19 exposure at UCI: [https://uci.edu/coronavirus/dashboard/index.php#workplace-exposure](https://uci.edu/coronavirus/dashboard/index.php#workplace-exposure)

Additionally, if any of your employees who have worked on campus have tested positive for COVID-19, please provide the following details by sending an email to covid19@uci.edu or call (949) 824-9918:

- Dates on campus, listed by day, during positive individual’s infectious period
- Campus locations where the positive individual worked during their infectious period
• Any UCI employees or students with whom the positive individual may have had contact during their infectious period

We expect the positive individual(s) to refrain from coming on the UCI campus until they are released to work as directed by their health care professional.

If you have any questions regarding this notification, please contact covid19@uci.edu or call (949) 824-9918.

Regards,

John Sterritt
Executive EHS Director

Contractors are instructed to contact the Coronavirus Response Center (covid19@uci.edu or at (949) 824-9918) with the names of any UCI persons who may have been exposed by a contractor with a confirmed COVID-19 positive case. This information will contain the names of the affected individuals, infectious periods, and campus work locations. The Coronavirus Response Center immediately emails the contractor’s information to Contact Tracing. Contact Tracing will obtain the applicable information and identify any campus locations of potential COVID-19 exposure and communicate to Strategic Communications for inclusion in the campus COVID-19 dashboard.

3. COVID-19 Training

COVID-19 training content has been developed and is available in an online course for UCI campus employees: Returning to Campus Training // Environmental Health & Safety // UCI

Campus employees are required to take this training as directed by UCI’s Executive Directive on COVID-19 training: UCI20_executivedirective-training-08-25-20.docx.pdf

Returning to Campus COVID-19 training content includes:

• What COVID-19 is, how it spreads and how to identify the symptoms;
• The importance of healthy hygiene practices, including but not limited to hand washing, and routine surface cleaning;
• The fact that particles containing the virus can travel more than six feet, especially indoor, 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;
• UCI’s Executive Directive on face coverings, process on providing respirators, and information on how to obtain a voluntary use respirators, commonly known as N95s, how to properly wear and perform a seal check, and that upon request, employees may obtain these around various locations on campus.
• UCI’s Working Well program, which helps employees identify potential COVID-19 symptoms on a daily basis and provides guidance on seeking medical care;
• Who to contact in the event of a positive case;
• Websites and additional resources to help keep employees up-to-date on UCI’s policies regarding COVID-19; and
• Supplemental modules for employees working in specific job functions at UCI.
For employees who have taken the COVID-19 Returning to Campus training prior to June 30, 2021, supplemental information related to COVID-19 protection measures and controls was distributed via the EHS website: https://www.ehs.uci.edu/public-health/covid-19/training-returning-to-campus.php

Aerosol Transmissible Disease Training

Aerosol Transmissible Disease (ATD) training is provided to any UCI employee who performs cleaning and disinfecting activities related to COVID-19 control measures. This training is conducted by EHS staff. ATD training and Bloodborne Pathogens (BBP) training is also provided to all Student Health Center employees. This training is conducted by EHS staff and is also available in UC Learning Center.

4. Face Coverings

A “compliant face covering” is defined as 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. Face coverings must not have visible holes or openings and must cover the nose and mouth. Face coverings do not include a scarf, ski mask, balaclava, bandana, turtleneck, collar, or single layer of fabric.

Regardless of vaccination status, UCI continues to provide face coverings and voluntary use respirators to all employees. Voluntary use respirators, commonly known as N95s, are available to all employees upon request. The UCI Logistics Team has stocked face coverings for all UCI employees and EHS and Facilities Management distribute to campus departments, via several campus distribution locations, and as requested. Additionally, HR has created a process to evaluate medical accommodations and provides an alternate face covering that is non-restrictive.

Information on how to obtain a face covering or a voluntary use respirator is provided on EHS’ webpage: Face Coverings and Voluntary Use Respirators (N95s) // Environmental Health & Safety // UCI

Current directives and advisories are available at: Executive Directives and Policies | Coronavirus Information Hub | UCI

5. Engineering controls, administrative controls, and PPE

UCI implements COVID-19 control measures that follow the hierarchy of controls: engineering controls, administrative controls, and personal protective equipment (PPE).

Engineering controls currently in place:

- Facilities Management maintains campus buildings with appropriate Minimum Efficiency Reporting Value (MERV)-rated filter and maintains Heating Ventilation and Air Conditioning (HVAC) systems with the appropriate air changes per hour and replaces filters, as necessary.
- Plexiglass partitions and barriers will continue to be provided if a minor or major outbreak has occurred.

Administrative controls currently in place:

- Enhanced cleaning occurs on a regular basis, in all occupied campus spaces, by custodial employees in Facilities Management, Student Housing, Campus Recreation, Child Care Services, Dining Services, and Student Health Center.
• Hazard assessments have been conducted for all cleaning activities. Appropriate training and PPE recommendations have been shared with these departments.
• Proper handwashing information is provided to the campus community and hand sanitizer stations are located in every building.
• For positive COVID-19 cases, decontamination is based on the last day the individual was on site and how long the space can be left unoccupied. UCI follows CDC recommendations on disinfection after a space was occupied by a COVID-19 positive individual: https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html

PPE controls in place:

• Based on the hazard assessments conducted for cleaning activities, appropriate PPE has been recommended and has been provided to custodial employees. Disposable nitrile gloves and safety glasses are required to be worn when performing cleaning activities.

6. Keep potentially exposed employees away from the workplace

Potentially exposed and positive employees are not allowed to return to work based on set criteria from the Center for Occupational and Environmental Health (COEH).

A COVID-19 positive case may return to work when any of the following occur:
For employees with symptoms, all of these conditions must be met:
   a. At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications;
   b. COVID-19 symptoms have improved; and
   c. At least 10 days have passed since COVID-19 symptoms first appeared

For asymptomatic employees, at least 10 days must have passed since the individual’s first positive COVID-19 test. An exposed employee who does not develop symptoms of COVID-19 may return to work after 10 days since the date of last known exposure.

7. Multiple and major COVID-19 infections and outbreaks

Definitions (abbreviated and not exclusive):
   a. “COVID-19 case” is a person who has a confirmed positive case, is subject to an order to isolate, or has died as a result of COVID-19.
   b. “COVID-19 exposed workplace” is a worksite or work area location the COVID-19 case used or accessed during the high-risk exposure period.
   c. “COVID-19 exposure” means physical or close contact with a COVID-19 case (greater than or equal to 15 minutes cumulatively over a 24-hour period and within 6 feet).
d. “Minor Outbreak” means 3 or more employee cases in an exposed workplace within a 14-day rolling period and continues until there are 0 cases for 14 days. Epidemiology links are now included per CDPH guidance.

e. “Major Outbreak” means 20 or more employee cases in an exposed workplace within a 30-day period and continues until there are 0 cases for 14 days.

Notifications for minor outbreaks apply to campus non-health care workers, staff, faculty/academics, and employees of contractors who worked at the exposed workplace during the infectious period of the outbreak. These employees do not need to have been exposed to be notified.

As a result of a minor outbreak, Contact Tracing and Vaccine Navigation Services (CTVNS) will notify Orange County Health Care Agency (OCHCA) within 48 hours. The notice requires the same information as would be required in an incident report in a Cal/OSHA 300 injury and illness log (names, number, occupation, and worksite), unless the information is inapplicable or unknown. CTVNS will also provide a list of the exposed work locations to Human Resources and exposure periods, if relevant. HR will contact departmental HR representatives (i.e., Campus Personnel Officers (CPOs)) with instructions to provide all names to Coronavirus Response Center (CRC) to schedule immediate testing.

Roles and Responsibilities:

a. CTVNS and COEH follows-up with employees per normal process if they test positive as a result of the asymptomatic outbreak testing.

b. EHS will investigate the outbreak and implement any necessary corrective actions, including potential stoppage of operations until corrections are made. This investigation and review will be documented and updated every thirty days if the outbreak continues.

c. CTVNS will continue to monitor until there are no new COVID-19 cases detected in the workplace for 14 days and inform HR when the period has been cleared. CTVNS will maintain these records for five years based on UCOP policy.

Notifications for minor outbreaks apply to campus non-healthcare workers including students, staff, faculty/academics, employees of subcontractors who worked at the exposed workplace during the infectious period of the outbreak (they do not need to have been exposed).

CTVNS will also provide a list of the exposed work locations and infectious periods to Human Resources. HR works with departmental HR representatives (i.e., Campus Personnel Officers (CPOs)) to collect information from supervisors who manage the work locations during the infectious periods (list of employee names who worked, UCInetID, email, preferred contact #).

- Human Resources provides the supervisor with a bilingual template (i.e., C19 AB 685 Notification Bilingual) and asks them to email all impacted staff for immediate testing.
- Human Resources provides the employee contact list to the Coronavirus Response Center.
- The Coronavirus Response Center will contact employees using bilingual scripts (i.e., C19 AB 685 Outbreak Notification Phone Script Bilingual). When there is a list of more than 50 individuals, the Coronavirus Response Center will prioritize Spanish speakers first.
- The Coronavirus Response Center maintains documentation for 5 years, per records and retention policy. Follow-up testing is not necessary since weekly asymptomatic testing for all essential onsite staff has been implemented.

As a result of a major outbreak, CTVNS will notify Orange County Health Care Agency (OCHCA) within 48 hours. The notice requires the same information as would be required in an incident report in a Cal/OSHA
300 injury and illness log (names, number, occupation, and worksite), unless the information is inapplicable or unknown.

**Roles and Responsibilities:**

a. CTVNS will also provide a list of the exposed work locations to HR and exposure periods if relevant. HR will contact departmental HR representatives (i.e., CPOs) with instructions to provide all names to the Coronavirus Response Center to schedule biweekly testing.

b. CTVNS and COEH will follow up with employees if they test positive as a result of the asymptomatic outbreak testing.

c. EHS will investigate the outbreak and implement any necessary corrective actions, including potential stoppage of operations until corrections are made. This investigation and review will be documented and updated every thirty days if the outbreak continues.

CTVNS will continue to monitor the outbreak until there are no new COVID-19 cases detected in the workplace for 14 days and inform HR when the period has been cleared. Contact Tracing will maintain documentation for up to 5 years, based on UCOP policy.