INJURY & ILLNESS PREVENTION PROGRAM

FOR

TEHAMA COUNTY DEPARTMENT OF EDUCATION

www.tehamaschools.org
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INTRODUCTION

In order to maintain a safe and healthful work environment the Tehama County Department of Education (TCDE) has developed this Injury & Illness Prevention Program for all employees to follow. This document describes the goals, statutory authority, and the responsibilities of all employees under the Program. It addresses Compliance, Hazard Identification, Accident Investigation, Hazard Mitigation, Training, Hazard Communication, and Program Documentation. By making employee safety a high priority we can reduce injuries and illnesses, increase productivity, and promote a safer and healthier environment for all individuals at TCDE.

GOALS

Diligent implementation of this program will reap many benefits for TCDE. Most notably it will:

1. Protect the health and safety of employees. Decrease the potential risk of disease, illness, injury, and harmful exposures to Department personnel.

2. Reduce workers’ compensation claims and costs.

3. Improve efficiency by reducing the time spent replacing or reassigning injured employees, as well as reduce the need to find and train replacement employees.

4. Improve employee morale and efficiency as employees see that their safety is important to TCDE.

5. Minimize the potential for penalties assessed by various enforcement agencies by maintaining compliance with Health and Safety Codes.

STATUTORY AUTHORITY

◆ California Labor Code Section 6401.7.
◆ California Code of Regulations Title 8, Sections 1509 and 3203.

RESPONSIBILITY

The ultimate responsibility for establishing and maintaining effective environmental health and safety policies specific to TCDE facilities and operations rests with the Superintendent. General policies, which govern the activities and responsibilities of the
Injury & Illness Prevention Program, are established under the Superintendent’s final authority.

It is the responsibility of Administrators, Supervisors and Managers to develop procedures, which ensure effective compliance with the Injury & Illness Prevention Program, as well as other health and safety policies related to operations under their control.

Administrators, Supervisors and Managers, are responsible for enforcement of this Program among the employees under their direction by carrying out the various duties outlined herein, setting acceptable safety policies and procedures for each employee to follow and ensuring that employees receive the general safety training. Each Administrator, Supervisors and Manager must also ensure that appropriate job specific safety training is received. Supervising others also carries the responsibility for knowing how to safely accomplish the tasks assigned each employee, for purchasing appropriate personal protective equipment, and for evaluating employee compliance.

Immediate responsibility for workplace health and safety rests with each individual employee. Employees are responsible for following the established work procedures and safety guidelines in their area, as well as those identified in this Program. Employees are also responsible for using the personal protective equipment issued to protect them from identified hazards, and for reporting any unsafe conditions to their supervisors.

The Superintendent is responsible for developing and managing this Injury & Illness Prevention Program.

**COMPLIANCE**

Compliance with this Injury & Illness Prevention Program will be achieved in the following manner:

1. Administrators, Supervisors and Managers will set positive examples for working safely and require that all staff under their direction work safely.

2. Administrators, Supervisors and Managers will use all disciplinary procedures available to them to ensure that employees follow established safety policies and procedures. Performance evaluations, verbal counseling, written warnings, and other forms of disciplinary action are available.

3. Administrators, Supervisors and Managers will identify the resources necessary to provide a safe work environment for their employees and include them in budget requests.
4. Administrators, Supervisors and Managers will establish appropriate means of recognition for employees who demonstrate safe work practices.

TCDE has developed this comprehensive Injury & Illness Prevention Program to enhance the health and safety of its employees.

HAZARD IDENTIFICATION

A health and safety inspection program is essential in order to reduce unsafe conditions, which may expose employees to incidents that could result in personal injuries or property damage. It is the responsibility of the Superintendent to ensure that appropriate, systematic safety inspections are conducted periodically.

Scheduled Safety Inspections
Upon initial implementation of this Program, inspections of all work areas will be conducted with appropriate abatement of any hazards detected.

Thereafter, safety inspections will be conducted at the frequency described below:

1. Annual inspections of all office areas will be conducted to detect and eliminate any hazardous conditions that may exist.

2. Semi-annual inspections of all potentially hazardous areas (shops, warehouses, sheds, etc.) will be conducted to detect and eliminate any hazardous conditions that may exist.

Unscheduled Safety Inspections
1. Additional safety inspections will be conducted whenever new equipment or changes in procedures are introduced into the workplace that presents new hazards.

2. Periodic unscheduled safety inspections of all potentially hazardous areas will be conducted to assist in the maintenance of a safe and healthful workplace.

3. Safety reviews will be conducted when occupational accidents occur to identify and correct hazards that may have contributed to the accident.
**ACCIDENT INVESTIGATIONS**

The Superintendent, Administrators, Supervisors and Managers will investigate all accidents, injuries, occupational illnesses, and near-miss incidents to identify the root cause. Appropriate repairs or procedural changes will be implemented promptly to correct the hazards implicated in these events.

To ensure timely accounting for Workers’ Compensation procedures, the employee shall report all details of the injury and supervisor must complete the Supervisor’s Report of Employee Injury (accident investigation) Form available in the appendix, on the website at www.tehamaschools.org or in the Human Resource Services (HRS) office.

**HAZARD CORRECTION**

When observed or discovered, unsafe or unhealthy work conditions and practices or procedures shall be corrected in a timely manner based on the severity of the hazards. Corrective actions or plans will be prepared and implemented by collaboration between the manager and maintenance department.

**TRAINING**

Effective dissemination of safety information lies at the very heart of a successful Injury & Illness Prevention Program. All employees will be trained in general safe work practices and safety information will be provided in the employee handbook and available on the TCDE website.

**Specific Safe Work Practices**

In addition to this general training, each employee will be instructed how to protect themselves from the hazards specific to their individual job duties. At a minimum this entails how to use workplace equipment, safe handling of hazardous materials and use of personal protective equipment.

The Superintendent is responsible for providing Administrators, Supervisors and Managers with the training necessary to familiarize themselves with the safety and health hazards their employees are exposed to.

It is the responsibility of each Administrator, Supervisor and Manager to know the hazards related to his/her employee’s job tasks, and ensure they receive appropriate training.

1. Supervisors will ensure that all employees receive general and job-specific training prior to initial or new job assignments.
2. Supervisors will ensure that employees are trained whenever new substances, processes, procedures or equipment are introduced to the workplace which may create new hazards. Training must also be given when new or previously unrecognized hazards are brought to a supervisor’s attention.

COMMUNICATION

Effective two-way communication, which involves employee input on matters of workplace safety, is essential to maintaining an effective Injury & Illness Prevention Program. To foster better safety communication the following guidelines will be implemented:

TCDE will use an Employee Bulletin Board, email and website for posting and communicating information on safety. Changes in protocol, safety bulletins, training announcements, and other safety information will be communicated, as they become available.

Administrators, Supervisors and Managers will provide time at periodic staff meetings to discuss safety topics. Status reports will be given on safety inspections, hazard correction projects, and accident investigation results, as well as feedback to previous employee suggestions. Employees will be encouraged to participate and give suggestions without fear of reprisal. Additional communication methods to be used are:

- Posters
- Meetings
- Employee Handbooks
- Safety Bulletins
- Warning Labels
- Electronic Communications (e-mail & website)

Employees are encouraged to bring to TCDE’s attention any potential health or safety hazard that may exist in the work area. The attached Safety Recommendation form (or equivalent) can be used for this purpose. These forms are also available on the website or in the HRS office.

Supervisors will follow up all suggestions and investigate the concerns brought up through these communication methods. Feedback to the employees is critical, and will be provided for effective two-way communication.

Compliance will be reinforced by:
- Appropriate comments on performance evaluations.
- Recognition by Direct Supervisor
Non-compliance will be addressed by:

- An immediate discussion between the supervisor and the employee who is discovered working in an unsafe manner.
- Appropriate comments on performance evaluations.
- Appropriate disciplinary action up to dismissal.

The Department will pursue readily understandable health and safety communications for all affected employees.

**DOCUMENTATION**

We are a local governmental entity and we are not required to keep written records of the steps taken to implement and maintain our IIP Program.* While written records are not required, we will endeavor to maintain the following records:

- Records of hazard assessment inspections
- Documentation of safety and health training

A safe and healthy workplace must be the goal of everyone at TCDE, with responsibility shared by management and staff alike. If you have any questions regarding this Injury & Illness Prevention Program, please contact the Human Resource Services office at 528-7334.

*California Labor Code §6401.7
Reviewed/Updated: July 2020
COMPANY NURSE® INJURY REPORTING

NOTE: *If life- or limb-threatening injury only, call 911!! Then report the injury / incident after the employee is stabilized.*

**Step 1** MAKE THE CALL BEFORE SEEKING TREATMENT

- Notify supervisor of the injury/incident
- In a quiet place, employee and/or supervisor call Company Nurse at 877-518-6702
- You will be asked to provide the following information during the call:
  1. Search Code
  2. Employer name and/or worksite
  3. Employee personal information
- Possible Outcomes as a result of the Call:
  - Self-care or basic first aid, OR
  - Referral to medical facility by a Nurse – Occ Health or Urgent Care or ER

**IMPORTANT!**
- Translators are available for more than 170 different languages
- Be prepared to write down a Call Confirmation Number

**Step 2** REPORT DISTRIBUTION AFTER THE CALL

- Report of Injury is emailed or faxed to key stakeholders at the employer
- If injured employee is referred for medical treatment, an Alert will be sent immediately to the medical provider to expect the employee at their facility

**Step 3** FOLLOW-UP CALL

- Additional Nurse Advice: Employees who were triaged by a nurse but not initially referred, are welcome to call our nurses again if injuries become worse or new symptoms develop for which they may require additional nurse advice or injury triage services and a possible referral for medical treatment.
Supervisor’s Report of Employee Injury

To Be Completed by Employer:

Employee Name:_____________________________________________________________

Occupation:____________________________________ Age:_______________________

Date of Injury:_______________________________Time of Injury:_____________ am/pm

Date Reported:___________________________Time Reported:_____________ am/pm

Accident Location:___________________________________________________________

Type of Injury: _____________________________________________________________

Medical Facility:______________________________________________________________

Did Injured Leave Work?__________Date:__________Time Reported:_______am/pm

Did Injured Return to Work:________Date:__________Time Reported:_______am/pm

1. Describe how the accident occurred: _________________________________
__________________________________________________________________________
__________________________________________________________________________
__________________________________________________________________________
__________________________________________________________________________

2. Names of witnesses:____________________________________________________
__________________________________________________________________________
__________________________________________________________________________
__________________________________________________________________________
__________________________________________________________________________

3. What steps have been taken to prevent similar accidents?: ______________
__________________________________________________________________________
__________________________________________________________________________
__________________________________________________________________________
__________________________________________________________________________

Supervisor’s Signature:_______________________________ Date:___________________
QUICK GUIDE
for
INVESTIGATION

This quick reference guide is information for supervisors and managers to use while investigating work related injuries and illnesses. Remember, prior to investigating an accident, employees should be trained to report injuries to supervision, no matter how minor they may be. “Near-accidents” should also be reported and investigated by supervision. Please follow these 4 easy steps when investigating work related injuries:

Step 1:
A. Act at once. Talk with injured employee immediately if possible (one on one is best). Use fact-finding, not fault-finding questions to determine what occurred. Ask the injured person or a witness to show you how the accident happened. The questions that you ask should focus on the who, what, when, where, how and why facts of the accident.

B. Review physical causes, such as poor housekeeping, improper guards, improper apparel (such as a lack of properly soled shoes or safety shoes, eye, hand, or head protection), defective equipment, slippery floors, or other working conditions. Completely describe location of incident: including lighting, walking surface, weather, measurements, and any other condition that could have contributed to or prevented the incident.

C. Review personal causes, such as dangerous practices, inability, inexperience, poor judgment, disobeying rules.

D. Trace down each item of information to find every contributory cause. Decide the necessary preventive measures to prevent similar accidents in the future. Report any defective equipment to the person responsible.

E. Non-injury accidents (an accident that nearly caused an injury of any severity) should also be investigated.

Step 2: Complete a supervisor accident investigation reporting form within 24 hours. Describe how the incident occurred; state facts, contributing factors, cite witnesses and support evidence. Keep a copy for your records and send original to the Human Resource Services office.

Step 3: HRS will provide injured employee with an “Employee’s Claim for Workers’ Compensation Benefits” form before or after treatment or as he or she is able.

Step 4: Follow-up with employee after he or she receives treatment to find out if they are doing well. In addition, ensure contributing factors to the accident, if any, are fixed (work orders sent) and all exposed employees are aware of the contributing causes of the accident.
### SAFETY RECOMMENDATION FORM

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#### IDENTIFICATION OF SAFETY OR HEALTH HAZARD

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#### SUGGESTION FOR ABATEMENT OF THE SAFETY OR HEALTH HAZARD

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**DO NOT WRITE BELOW THIS LINE**

Date investigated:
Investigated by:
Action taken:

Date Completed:
Comments:

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*Please provide this form to the HRS office.*
Purpose
It is the policy of the Tehama County Department of Education (TCDE) to ensure a safe and healthy environment for employees, staff, and students. Communicable and infectious diseases such as COVID-19 are minimized by providing prevention, education, identification through examination, surveillance, immunization, treatment and follow-up, isolation, and reporting.

Due to the widespread of COVID-19 in the community TCDE has implemented the following infection control measures, including applicable and relevant recommendations from the Centers for Disease Control and Prevention (CDC) and our state and local guidelines.

Introduction
What is Covid-19?
On February 11, 2020, the World Health Organization announced an official name for the disease that is causing the 2019 novel coronavirus outbreak, first identified in Wuhan China. The new name of this disease is Coronavirus disease 2019, abbreviated as COVID-19. In COVID-19, 'CO' stands for 'corona,' 'VI' for 'virus,' and 'D' for disease. Formerly, this disease was referred to as “2019 novel coronavirus” or “2019-nCoV”.

There are many types of human coronaviruses including some that commonly cause mild upper-respiratory tract illnesses. COVID-19 is a new disease, caused by a new coronavirus that has not previously been seen in humans. There is currently no vaccine to prevent COVID-19.

What are the Symptoms of Covid-19?:
Symptoms may appear 2-14 days after exposure to the virus. People with these symptoms may have COVID-19:

- Cough
- Shortness of breath or difficulty breathing
- Fever
- Chills
- Muscle pain
- Sore throat
- New loss of taste or smell
Procedures to Help Prevent the Spread of COVID-19

Protect Yourself

Older adults and people who have severe underlying medical conditions like heart or lung disease or diabetes seem to be at higher risk for developing serious complications from COVID-19 illness.

How does it spread?

There is currently no vaccine to prevent coronavirus disease 2019 (COVID-19). The best way to prevent illness is to avoid being exposed to this virus.

- The virus is thought to spread mainly from person-to-person.
- Between people who are in close contact with one another (within about 6 feet).
- Through respiratory droplets produced when an infected person coughs, sneezes or talks.
- Through respiratory droplets that can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs.

Some recent studies have suggested that COVID-19 may be spread by people who are not showing symptoms.

To prevent the spread of respiratory infections from one person to the next, frequent hand washing is recommended.

Germs can spread from other people or surfaces when:
- Touching eyes, nose, and mouth with unwashed hands
- Prepare or eat food and drinks with unwashed hands
- Touch a contaminated surface or objects
- Blowing nose, coughing, or sneezing into hands and then touching other people’s hands or common objects.
- Touching an item or surface in a public area that may be frequently touched by other people, such as door handles, tables, etc.

Hand Hygiene

Hand hygiene procedures include the use of alcohol-based hand rubs and hand washing with soap and water. Washing hands with soap and water is the best way to get rid of germs in most situations, and it’s one of the most effective ways to prevent the spread of germs. If soap and water are not readily available, use an alcohol-based hand sanitizer (containing at least 60% alcohol).

Properly hand wash with soap and water by:
- Wet hands first with water (avoid using hot water).
- Apply soap to hands.
- Rub hands vigorously for at least 15 seconds, covering all surfaces of hands and fingers.
Rinse hands with water and dry thoroughly with paper towel.

Use paper towel to turn off water faucet.

Alcohol-based hand rub is an ideal method for decontaminating hands, except when hands are visibly soiled (e.g., dirt, blood, body fluids), and may not remove harmful chemicals from hands like pesticides and heavy metals, in which case soap and water should be used. Hand hygiene stations should be strategically placed to ensure easy access.

Using Alcohol-based Hand Rub (follow manufacturer’s directions):
° Dispense the recommended volume of product;
° Apply product to the palm of one hand; and
° Rub hands together, covering all surfaces of hands and fingers until they are dry (no rinsing is required), this should take around 20 seconds.

Handwashing facilities will be maintained to provide adequate supply of hand washing soap and paper towels.

**Coughing and Sneezing Etiquette**

Covering coughs and sneezes and keeping hands clean can help prevent the spread of serious respiratory illnesses.

Germs can be easily spread by:
° Coughing, sneezing, or talking
° Touching your face with unwashed hands after touching contaminated surfaces or objects
° Touching surfaces or objects that may be frequently touched by other people
° Covering coughs and sneezes and washing hands are especially important for infection control measures in healthcare settings, such as emergency departments, doctor’s offices, and clinics.

To help stop the spread of germs:
° Cover mouth and nose with a tissue when coughing or sneezing.
° Throw used tissues in the trash.
° If a tissue is not available, cough or sneeze into the elbow, not in hands.
° Immediately wash hands with soap and water for at least 20 seconds. If soap and water are not readily available, clean hands with a hand sanitizer that contains at least 60% alcohol.
Avoid Close Contact - Distancing

Physical distancing is an effective method that can help stop or slow the spread of an infectious disease by limiting the contact between people. For COVID-19, the recommended distance is at least 6 feet. To help prevent the spread of respiratory disease, employees should avoid close contact with people who are sick.

Each site will have a plan in place to ensure social distancing at their location. The plan may include, but is not limited to the following:

- Implementing flexible work hours by rotating or staggering shifts to limit the number of employees on site at the same time
- Increasing physical space between employees by modifying the workspace.
- Avoiding shared work spaces (desks, offices, and cubicles) and work items (phones, computers, other work tools, and equipment) when possible. If they must be shared, following the cleaning and disinfecting the building and facility guidelines to clean and disinfect shared workspaces and work items before and after use.
- Increasing physical space between employees and public by offering drive-through service or physical barriers such as partitions.
- Using signs, tape marks, or other visual cues on the floor, placed 6 feet apart, to indicate where to stand when physical barriers are not possible.
- Close or limited access to common areas where employees are likely to congregate and interact.
- Delivering services and holding meetings remotely by phone, video or internet.
- Limiting any unnecessary travel with passenger(s) from one site to another in work vehicles and personal employee vehicles.
- Eliminating all non-essential and non-related services, such as entertainment activities.
- Using videoconferencing or teleconferencing when possible for work-related meetings and gatherings.
- Canceling, adjusting, or postponing large work-related meetings or gatherings that can only occur in-person in accordance with state and local regulations and guidance.
- When videoconferencing or teleconferencing is not possible, holding meetings in open, well-ventilated spaces continuing to maintain a distance of 6 feet apart and wear cloth face coverings.

Employees will also be asked to practice social distancing outdoors including, but not limited to the following:

- When working in sports fields, playgrounds, assembly areas, and/or other outdoor areas
- Before starting the work shift
- After the work shift
- Coming and going from vehicles
• Entering, working and exiting physical buildings or other structures
• During breaks and lunch periods

If an Employee is Sick
Employees will be asked to monitor their health each day, and are asked to notify their supervisor before their scheduled shift and prior to arriving at the site, if they have been exposed to someone with COVID-19 or you have a temperature of 100.4 or more, tiredness, chills, shortness of breath, difficulty breathing, nausea, vomiting, diarrhea, sore throat, loss of taste or smell, cough, or muscle pain.

If an employee is not feeling well and is exhibiting symptoms that may be attributed to COVID-19, such as acute respiratory symptoms or a fever, TCDE will:
• Immediately send employees with acute respiratory illness symptoms home or to medical care as soon as possible
• Actively encourage sick employees to stay home.
• If an employee goes home because they are sick, follow the cleaning and disinfecting the building and facility guidelines to disinfect the area/room/office where the person worked, the tools and equipment they used prior to use by others.
• Employees who are well but who have a sick family member at home with COVID-19 should notify their supervisor and follow CDC-recommended precautions.

Personal Protective Equipment
While engineering and administrative controls are considered more effective in minimizing exposure to COVID-19, PPE may also be needed to prevent certain exposures. While correctly using PPE can help prevent some exposures, it should not take the place of other prevention strategies. Examples of PPE include: gloves, goggles, face shields, face masks, and respiratory protection, when appropriate.

During an outbreak of an infectious disease, such as COVID-19, recommendations for PPE specific to occupations or job tasks may change depending on geographic location, updated risk assessments for workers, and information on PPE effectiveness in preventing the spread of COVID-19.

Unless otherwise directed by your supervisor, all employees must cover their mouth and nose with a cloth face cover when around others.

• You could spread COVID-19 to others even if you do not feel sick.
• Everyone should wear a cloth face cover.
  o Cloth face coverings should not be placed on young children under age 2, anyone who has trouble breathing, or is unconscious, incapacitated or otherwise unable to remove the mask without assistance.
• The cloth face cover is meant to protect other people in case you are infected.
• Do NOT use a facemask meant for a healthcare worker.
• Continue to keep about 6 feet between yourself and others. The cloth face cover is not a substitute for social distancing.

Washing Facilities
Notify your supervisor if any washing facilities do not have an adequate supply of suitable cleansing agents, water and single-use towels or blowers.

Cleaning and Disinfecting
TCDE will establish routine schedules to clean and disinfect common surfaces and objects in the workplace. This includes, but is not limited to, classroom technology devices, containers, counters, tables, desks, chairs, benches, door handles, knobs, drinking fountains, refrigerators, vending machines, portable restroom and bathroom surfaces, automobiles and buses - inside and out, and trash cans.

The process of disinfecting includes providing disinfecting products, that are EPA approved for use against the virus that causes COVID-19 and following the manufacturer's instructions for all cleaning and disinfection products (e.g., safety requirements, PPE, concentration, contact time.)

Coronaviruses on surfaces and objects naturally die within hours to days. Warmer temperatures and exposure to sunlight will reduce the time the virus survives on surfaces and objects. Normal routine cleaning with soap and water removes germs and dirt from surfaces. It lowers the risk of spreading COVID-19 infection.

Disinfectants kill germs on surfaces after cleaning, that can further lower the risk of spreading infection. Employees will need to follow the district’s approved disinfecting products and procedures when using disinfectants. Disinfecting procedures include:

• Some surfaces only need to be cleaned with soap and water. For example, surfaces and objects that are not frequently touched should be cleaned and do not require additional disinfection.
• Clean and disinfect frequently touched surfaces daily and shared workspaces and work items before and after use.
• Store and use disinfectants in a responsible and appropriate manner according to the label.
• Keep all disinfectants out of the reach of children. Disinfectants should typically not be applied on items used by children, especially any items that children might put in their mouths. Many disinfectants are toxic when swallowed.
• Do not overuse or stockpile disinfectants or other supplies.
• Always wear gloves appropriate for the chemicals being used when you are cleaning and disinfecting. Additional personal protective equipment (PPE) may be needed based on setting and product.
• Areas unoccupied for 7 or more days need only routine cleaning.
• Outdoor areas generally require normal routine cleaning and do not require disinfection.
Electronics

For electronics, such as tablets, touch screens, keyboards, remote controls, and ATM machines:
- Consider putting a wipeable cover on electronics.
- Follow manufacturer’s instruction for cleaning and disinfecting.
- If no guidance, use alcohol-based wipes or sprays containing at least 70% alcohol. Dry surface thoroughly.

Cleaning and Disinfecting Building or Facility if Someone is Sick:
- Close off areas used by the sick person.
- Open outside doors and windows to increase air circulation in the area.
  - Wait 24 hours before you clean or disinfect.
  - If 24 hours is not feasible, wait as long as possible.
- Clean and disinfect all areas used by the sick person, such as offices, bathrooms, common areas, shared electronic equipment like tablets, touch screens, keyboards, remote controls.
- Always wash immediately after removing gloves and after contact with a sick person.
- If more than 7 days since the sick person visited or used the facility, additional cleaning and disinfection is not necessary.
- Continue routine cleaning and disinfection

Employee Training

TCDE will provide regular training for employees on the following topics:
- What is COVID-19 and how is it spread
- Signs and symptoms of COVID-19
- When to seek medical attention if not feeling well
- Prevention of the spread of COVID-19 if you are sick
- Physical and social distancing guidelines
- Importance of washing hands with soap and water or use of hand sanitizer if soap and water are not readily available.
- Reminders and methods to avoid touching eyes, nose and mouth
- Coughing and sneezing etiquette
- Safely using cleansers and disinfectants

Compliance

This addendum will be reviewed regularly and according to federal, state and local requirements. These guidelines and written addendum are subject to change as information is received and the situation evolves.