

# Model COVID Prevention Program (CPP)

### Purpose

This program is intended for all TV and Film Productions located in California and provides a summary of the basic procedures for prevention of COVID-19 in the workplace. These current guidelines have been modified from the California-Occupational Safety and Health (Cal-OSHA) Emergency Temporary Standard (ETS) and will follow the new CCR, Title 8 sections 3205 through 3205.3 regulations. This guideline will apply until February 3, 2025, and all recordkeeping subsections 3205(j)(2) through (3), will continue to be recorded and reported until a minimum of February 2026.

This Infectious Agent-COVID Prevention Program (CPP) is designed to control exposures to the SARS-CoV-2 virus (severe acute respiratory syndrome coronavirus 2) that causes COVID-19 (Coronavirus Disease 2019) that may occur on our production's. In California, all productions are required to establish, implement, and maintain an effective, written Injury and Illness Prevention (IIPP) program that meets the requirements of California Code of Regulations (CCR), Title 8, section 3203. COVID-19 is considered a workplace hazard. This model CCP will be included with our production IIPP documents.

## **Application**

COVID-19 remains a recognized hazard and this CPP Program outlines the written procedures that will be effectively implemented to control this hazard on the following production:

Production Title:	
Production Company:	
, ,	
The following individuals are the key points of contact with significant responsibility for health and safety:	
1st Assistant Director:	
Cell:	
Construction Coordinator:	
Cell:	
Unit Production Manager:	
Cell:	
Production Office Coordinator:	
Cell:	
Production Safety Representative:	
Cell:	
Production Safety Consultant:	
Call·	



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COVID-19 continues to be treated as an airborne infectious disease. This California-CPP program will be used in determining measures to prevent COVID-19 transmission, identifying and correcting COVID-19 hazards in our Production. This program will apply to all Cast and Crew that are employed for the Production. All symptomatic persons in our workplace are treated as potentially infectious, regardless of symptoms, vaccination status, or negative COVID-19 test results.

The State of California and the local health department will have regulatory jurisdiction covered by this CPP. Therefore, should any orders and guidance be given, all controls will be reviewed and measures to prevent the transmission and identifying and correcting COVID-19 hazards. COVID-19 prevention controls may include, but is not limited to:

- Remote work.
- Physical distancing.
- Reducing population density indoors.
- Moving indoor tasks outside.
- Implementing separate shifts and/or break times.
- Restricting access to work areas.

### Authority & Responsibilities

### Production Management (Unit Production Manager (UPM), Department Heads or Supervisors)

Production management is responsible for:

- Completing the COVID Prevention Plan (CPP) and IIPP templates and maintaining a copy of the program in the production office and providing a copy to the Production Safety Representative assigned to the production.
- Ensure communication of the safety and health guidelines for infectious agents and any close contact notification are provided to all cast/crew.
- Ensure all cast/crew receive required training on the IIPP, CPP and Infectious agent training during orientation and start-up.
- Ensure adequate PPE is resourced and provided to cast/crew upon request.
- Ensure all work-related positive cases are properly managed in accordance with this COVID Prevention Plan (CPP).
- Ensure that all work-related positive cases that result in serious injury (hospitalization) or patient seeks medical attention above first aid are properly reported to production safety representative, HSM and placed in the Disney MyCority Incident Management system.
- Ensure all cast/crew are properly trained and acknowledge training in the start-up packet and training conducted by the Disney Production Safety representatives.
- Reporting all Work-related COVID cases in the MyCority system and HSM or Production Safety representative.
- Implementing Exposure Control Plans for outbreaks of (3 or more positive) and major outbreaks (20 or more positive).

### Production Safety Representatives or HSM- (COVID Manager), if available on Production:

- Training Production management on the IIPP and CCP programs and how to create one for their production at the start of the production.
- Providing training to production management of all COVID guidelines and prevention plans
- Ensuring training and acknowledgements are made available to all production management.
- Ensuring production personnel are trained to properly report and input positive cases into the Disney MyCority Incident Management system and/or other safety management system.
- Advising Productions on proper PPE, case management and handling of positive cases
- Reporting to CAL-OSHA any Major Outbreaks and working with production management any Cal-OSHA or other agency investigations
- Advising and supporting production management on implementing Exposure Control Plans for any Outbreaks or Major Outbreaks.
- Calculating and advising productions on proper Engineering Controls such as Ventilation or alternate methods to properly manage and control infectious agents.



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• Ensuring proper reporting and OSHA recordkeeping is properly maintained in accordance with this guideline and Disney Record Retention program.

#### Cast and Crew

- Reporting any symptoms or COVID positive
- Ensuring they isolate at home for proper timeframes if testing positive or symptomatic.
- Wear proper PPE as advised by production management.
- If respiratory N95 requested, participate in the N95 Voluntary use training.

### **Training**

All cast and crew on a production will be properly trained during the on-boarding process for each new production and will acknowledge training in their start up packages. This training will typically be provided by the COVID-HSM team. A record of this training will be maintained in the learning management system. All cast/crew are encouraged to report symptoms to the Production Coordinator and/or Department Head and to stay home when ill.

## Infectious Agent (COVID) Prevention Guidelines:

The following procedures will be used when managing COVID-19 in accordance with the California Title 8 3205 regulations.

### Testing of Close Contacts During Outbreaks or Major Outbreaks

COVID-19 tests are available at no cost, during paid time, to all our cast/crew who had a close contact in the workplace.

Exceptions are returned cases as defined in CCR, Title 8, section 3205(b)(11).

#### **Positive Cases**

If cast/crew test positive for COVID-19:

The positive case should immediately submit a Positive Case Reporting Form to the DET Contact Tracers

- If you test positive and <u>ARE</u> experiencing unexplained COVID-19 symptoms:
  - Stay at home
  - Isolation can end once symptoms are no longer present or are mild and improving; AND fever has been resolved for 24-hours (without the use of fever-reducing medication)
  - Wear a well-fitted face covering around others for 10 days from onset of symptoms, especially in indoor settings. May remove face covering before Day 10 if you have two sequential negative tests at least one day apart.
- If you test positive and <u>ARE NOT</u> experiencing COVID-19 symptoms:
  - Crew may continue working, but must wear a face covering (for 10 days from positive test)
  - **Performers** to work unmasked, you must wait to return until you have two sequential negative tests at least 24 hours apart. The first test must be taken at least 1 day after the initial positive result.

#### Close Contacts

If another Cast/crew at work were exposed to COVID-19:

- Performers and crew members should wear a well-fitted mask around others for a total of 10 days from exposure to a positive case, especially in indoor settings.
- Cast should wear a mask when they are not performing or having hair and makeup applied.
- Watch for symptoms (fever, cough, shortness of breath, etc.), and if you develop symptoms, isolate immediately and contact your immediate supervisor.



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- CA Department of Health recommends testing for close contacts when a close contact (1) has new COVID-19 symptoms, (2) is at higher risk of severe disease, or (3) has contact with people who are at higher risk of severe disease.
- Antigen test given to close contacts (if requested) to be taken 3-5 days after exposure to positive case.

#### Notice of COVID-19 Cases

• Cast, crew, and independent contractors who had a close contact, as well as any employer with an employee who had a close contact, will be notified as soon as possible by production management.

### Personal Protective Equipment

#### Face Masks

- Cast and Crew will be provided face coverings and required to wear them:
  - When required by orders from the California Department of Public Health (CDPH). This includes spaces within vehicles when a CDPH regulation or order requires face coverings indoors.
  - o During outbreaks and major outbreaks.
  - When employees return to work after having COVID-19 until 10 days have passed since the date that COVID-19 symptoms began or, if the person did not have COVID-19 symptoms, from the date of their first positive COVID-19 test, or after a close contact.
- Face coverings will be clean, undamaged, and worn over the nose and mouth. The following exceptions may apply:
  - When a cast/crew is alone in a room or vehicle.
  - While eating or drinking at the workplace, provided employees are at least six feet apart and, if indoors, the supply of outside or filtered air has been maximized to the extent feasible.
  - While cast/crew are wearing respirators required by the employer and used in compliance with CCR, Title 8 section 5144.
  - Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing- impaired person. Such employees shall wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if the condition or disability permits it.
  - During specific tasks which cannot feasibly be performed with a face covering. This exception is limited to the time period in which such tasks are actually being performed.
- If an employee is not wearing a face covering due to exceptions (4) and (5), above, the COVID-19 hazards will be assessed, and action taken as necessary.
- Employees will not be prevented from wearing a face covering, including a respirator, when not required by this section, unless it creates a safety hazard.

## Respirators

Respirators (e.g., N95) will be provided for voluntary use to employees who request them. Employees who request respirators for voluntary use will be:

- Encouraged to use them.
- Provided with a respirator of the correct size.
- Follow the Production Safety voluntary N95 respiratory Protection training, acknowledgement of use and protocols prior to use. <a href="N95-Respirator-Guidelines-COVID-19.pdf">N95-Respirator-Guidelines-COVID-19.pdf</a> (disney.com)
- Trained on:
  - How to properly wear the respirator provided.
  - How to perform a user seal check according to the manufacturer's instructions each time a respirator is worn.
  - The fact that facial hair interferes with a seal.



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## Health Screening

- Cast or crew members exhibiting COVID symptoms, shall not report to the workplace and must inform their immediate supervisor.
- If performers or crew members begin exhibiting COVID symptoms at the workplace, they shall report to their immediate supervisor.

### Notification of Benefits

Production management will provide excluded employees information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws. This includes any benefits available under legally mandated sick leave, workers' compensation law, and local governmental requirements.

### Ventilation

Production Facilities will continue to be assessed to ensure that they have a fully functional General Ventilation (GV)-Heating, Ventilation and Air-Conditioning (HVAC) system that meets acceptable indoor air quality guidelines (ASHRAE 62.1), upon request by production management. This is required prior to leasing, when there are outbreaks of 3 or more cases, and/or after any Major Outbreak (20 or more positive) situations. Structures designed for occupancy must conform to applicable local and/or national codes and standards which provides adequate control protections.

In general, an HVAC system should be operating during production, provide adequate air exchange rate and provide acceptable filtration. This may require a hazard assessment of production tasks, offices, mills, and stages that were not previously assessed. Your Disney Production Safety representative and Industrial Hygiene (CIH) representatives are available to provide calculations and guidance on all new facilities and production operations. The following basic guidelines are provided:

- Work with your assigned Production Safety representative for a ventilation hazard assessments and engineering reviews, as needed.
- Provide Production Safety representative (CIH) the facility specifications (dimensions, engineering drawings, facility
  contacts and HVAC information) to assist with the hazard assessment and engineering review if this was not
  completed previously on this location.
- The facility should maximize the supply of outside air to the extent feasible, except when the United States Environmental Protection Agency (EPA) Air Quality Index is greater than 100 for any pollutant or if opening windows or maximizing outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.
- In buildings and structures with mechanical ventilation, filter circulated air through filters at least as protective as Minimum Efficiency Reporting Value (MERV)-13, or the highest level of filtration efficiency compatible with the existing mechanical ventilation system.
- Use High Efficiency Particulate Air (HEPA) filtration units in accordance with manufacturers' recommendations in indoor areas occupied by employees for extended periods, where ventilation is inadequate to reduce the risk of COVID-19 transmission.
- Continue to maximize the % of outdoor air use provided in the space when high occupancy situations arise.
- In vehicles, we will maximize the supply of outside air to the extent feasible, except when doing so would cause a hazard to employees or expose them to inclement weather.

## Reporting & Recordkeeping Requirements

Production management must keep a record of and track all COVID-19 positive cases that are work-related. Some positive cases require proper reporting to Cal-OSHA which will be conducted by the COVID-HSM team based on current state requirements. In addition, Cal OSHA requires recording some cases on the annual Cal-OSHA 300 logs. The positive cases must only be tracked on an OSHA -300 log if patient was infected as a result of performing their work-related duties *and* meet the criteria for tracking in the California OSHA Recordkeeping regulations.



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Under California Division of Occupational Safety and Health (Cal/OSHA) regulations, California employers are required to record work-related fatalities, injuries and illnesses, and must record a work-related COVID-19 fatality or illness like any other occupational illness. (Cal. Code Regs., tit. 8, § 14300.4(a).) To be recordable, an illness must be work-related and result in one of the following:

- Death
- Days away from work.
- Restricted work or transfer to another job.
- Medical treatment beyond first aid.
- Loss of consciousness.
- A significant injury or illness diagnosed by a physician or other licensed health care professional. (Cal. Code Regs., tit. 8, § 14300.7(b)(1).)

If a work-related COVID-19 case meets one of these criteria, then the Production must record the case on their Form 300 and input the case into the Disney MyCority system. To assist with determining if a case is work related, review the following FAQ. Recording and Reporting Requirements for COVID-19 Cases - Frequently Asked Questions.

- Only these cases shall be input to the Incident Management System (MyCority) by production management (POC/Medic/DH or other) as done for other injuries/illnesses. If you have any questions, contact your Production Safety Representative. <u>COVID-19 - Regulations | Occupational Safety and Health Administration (osha.gov)</u> This information will be sent to the payroll companies for state reports and tracked on the OSHA recordkeeping logs.
- All cases that are work-related and result in Serious Injury (hospitalized) must be immediately reported to the
  Production Safety representative and a determination made if California OSHA reporting is necessary. In general,
  these work-related exposures that result in Serious Injury classification, require reporting to Cal-OSHA within 8-hours.
- All cases of 3 or more that are deemed to be work-related from one production location must be immediately reported to the Production Safety Representative or HSM. The Outbreak Exposure Control Plan must be reviewed and implemented.
- All cases of 20 or more that are deemed to be work-related must be immediately reported to the Production Safety Representative or HSM. The Outbreak Exposure Control Plan must be reviewed and implemented.
- These records will be retained in accordance with the Disney Production Safety Record Retention Policy.

#### Outbreaks Exposure Control Plan (ECP)

If three or more employee COVID-19 cases within an exposed group visited the workplace during their infectious period at any time during a seven-day period, the following applies until there are one or fewer new COVID-19 cases detected in the exposed group for a seven-day period:

#### Exclude from Work

All COVID-19 cases, as well as employees who had close contacts but do not take a COVID-19 test, will be excluded from the workplace.

#### **COVID-19 Testing**

We immediately provide COVID-19 testing available at no cost to our employees within the exposed group, regardless of vaccination status, during employees' paid time, and will continue to make tests available to employees at least weekly until there are one or fewer new COVID-19 cases detected in the exposed group for a 14-day period.

Employees who had close contacts and remain at work will be required to take a COVID-19 test within three to five days after the close contact and those who test positive for COVID-19 will be excluded. Those who do not take a COVID-19 test will be excluded until our return-to-work requirements have been met.

#### **Face Coverings**

Employees in the exposed group, regardless of vaccination status, will wear face coverings when indoors, or when outdoors and less than six feet from another person, unless one of the exceptions in our CPP applies.



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#### Respirators

Employees will be notified of their right to request and receive a respirator for voluntary use, as stipulated in our CPP.

#### Ventilation

Buildings or structures with mechanical ventilation will have recirculated air filtered with Minimum Efficiency Reporting Value (MERV)-13 or higher efficiency filters, if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, filters with the highest compatible filtering efficiency will be used. High Efficiency Particulate Air (HEPA) air filtration units will be used in accordance with manufacturers' recommendations in indoor areas occupied by employees for extended periods, where ventilation is inadequate to reduce the risk of COVID-19 transmission.

These ventilation requirements will continue to be implemented after the outbreak has passed and CCR, Title 8 section 3205.1 is no longer applicable.

### Major Outbreaks Exposure Control Plan

If 20 or more employee COVID-19 cases within an exposed group visited the workplace during their infectious period at any time during a 30-day period, the following applies until there are one or fewer new COVID-19 cases detected in the exposed group for a 14-day period:

- Immediately, report all cases of work-related COVID in the My-Cority injury/illness management system and contact your Production Safety representative and/or your HSM if on a production.
- Work with your Production Safety Representative or HSM to review and implement an Exposure Control Plan for Infectious Agents (COVID).
- Exclude COVID-19 cases as well as employees in the exposed group who do not take a COVID-19 test.
- Immediately ensure that all employees in the exposed group who remain at work are tested for COVID-19 at least twice weekly until there are one or fewer new COVID-19 cases detected in the exposed group for a 14-day period.
   Employees in the exposed group that do not take the COVID-19 test will be excluded until our return-to-work criteria have been met.
- Report the outbreak to Cal/OSHA. (Within 8 hours);
- Provide respirators for voluntary use to employees in the exposed group, encourage their use, and train employees
  according to CCR, Title 8 section 5144(c)(2) requirements and Disney Production Safety Protocols. <a href="N95-Respirator-Guidelines-COVID-19.pdf">N95-Respirator-Guidelines-COVID-19.pdf</a> (disney.com)
- Any employees in the exposed group who are not wearing respirators as required will be separated from other persons by at least six feet, except where it can be demonstrated that at least six feet of separation is not feasible, and except for momentary exposure while persons are in movement. Methods of physical distancing include:
  - o 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.
  - Adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.
  - o When it is not feasible to maintain a distance of at least six feet, individuals will be as far apart as feasible.