

Cal/OSHA and the Decision Tree and Face Covers at School

May 4, 2021

The decision tree allows...

- Individuals to end quarantine and **return to school/work after 10 days** following the last contact with a COVID-19 patient as long as they can self-monitor for COVID-19 symptoms and consistently use face covering and distance at least 6 feet from all others through Day 14.
- People with recently acquired immunity (recently recovered from COVID-19 or fully immunized) to be **excluded from the requirement to quarantine** following close contact with a COVID-positive individual.

Subsection (c)(10)(B) of the temporary emergency standards states:

“Employers shall exclude employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.”

But...subsection (c)(10)(D) says:

“If an order to... quarantine an employee is issued by a local or state health official, the employee shall not return to work until the period of... quarantine is completed or the order is lifted. If no period was specified, then the period shall be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.”

And the guidance in the decision tree is based on the public health order on quarantine.

We're asked Cal/OSHA for clarification.

Is the local public health order on quarantine sufficient to allow an employer to:

- Use the 10-day quarantine option for employees who are close contacts?
- Exclude employees with recently acquired immunity from the quarantine requirement?

We have not received any answers, but...

Yesterday the CDPH released an updated version of the COVID-19 Public Health Recommendations for Fully Vaccinated People

It includes the following as “key points”

Fully vaccinated people can:

- *Refrain from quarantine and testing following a known exposure if asymptomatic[1].*
 - *Following a known exposure at work, fully vaccinated workers do not need to quarantine if asymptomatic.*
 - *In the workplace, employers subject to the [Cal/OSHA COVID-19 Prevention Emergency Temporary Standards \(ETS\)](#) must ensure that employees are following the current ETS face covering and testing requirements.*

There is still disagreement on whether or not this guidance alters the application of the emergency temporary standards.

Less Risk

Require all employees to quarantine for 14 days following a close contact without regard to their vaccination status.

More Risk

Rely on the statements in the “recommendations for fully vaccinated people” and exclude employees from quarantine following close contact if they have been fully vaccinated.

Consult with your attorney or human resources professional.

Quotes from the consolidated guidance on face covers at school

- Students in all grade levels K-12 **are required to wear face coverings at all times, while at school, unless exempted.**
 - A cloth face covering or face shield should be removed for meals, snacks, naptime, or when it needs to be replaced. When a cloth face covering is temporarily removed, it should be placed in a clean, safe area, clearly marked with the student's name and date, until it needs to be put on again.
- Participants in youth and adult sports should wear face coverings when participating in the activity, **even with heavy exertion as tolerated, both indoors and outdoors.**
- In order to comply with this guidance, **schools must exclude students from campus** if they are not exempt from wearing a face covering under CDPH guidelines and refuse to wear one provided by the school.