

**State of California**

Department of Industrial Relations  
Division of Occupational Safety and Health  
Foster City District Office  
1065 East Hillsdale Blvd, Suite 110  
Foster City, CA 94404  
Phone: (650) 573-3812 Fax: (650) 573-3817

**Inspection #:** 1515268  
**Inspection Dates:** 02/18/2021 - 06/23/2021  
**Issuance Date:** 06/24/2021  
**CSHO ID:** D9005  
**Optional Report #:** 040-21



**Citation and Notification of Penalty**

**Company Name:** MidPen Housing Corporation  
**Establishment DBA:** and its successors  
**Inspection Site:** 2700 Ash St  
Palo Alto, CA 94306

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Citation 1 Item 1 Type of Violation: **General**

**Title 8 CCR Section § 3205(c). COVID-19 Prevention.**

**(c) Written COVID-19 Prevention Program. Employers shall establish, implement, and maintain an effective, written COVID-19 Prevention Program, which may be integrated into the employer's Injury and Illness Program required by section 3203, or be maintained in a separate document. The written elements of a COVID-19 Prevention Program shall include:**

- (1) System for communicating.**
- (2) Identification and evaluation of COVID-19 hazards.**
- (3) Investigating and responding to COVID-19 cases in the workplace.**
- (4) Correction of COVID-19 hazards.**
- (5) Training and instruction.**
- (6) Physical distancing.**
- (7) Face coverings.**
- (8) Other engineering controls, administrative controls, and personal protective equipment.**
- (9) Reporting, recordkeeping, and access.**
- (10) Exclusion of COVID-19 cases.**
- (11) Return to work criteria.**

Prior to and during the course of the inspection, including but not limited to February 18, 2021, the employer failed to establish a written effective COVID-19 Prevention Program that included all the required elements, including:

1. Procedures outlining the system of communication. [3205(c)(1)]
2. Procedures for the identification and evaluation of COVID-19 hazards. [3205(c)(2)]
3. Procedures for Investigating and responding to COVID-19 cases in the workplace. [3205(c)(3)]
4. Procedures for the correction of COVID-19 hazards [3205(c)(4)]
5. Provisions for training [3205(c)(5)]
6. Procedures for evaluating and determining if it is necessary to implement other engineering controls, administrative controls, and personal protective equipment. [3205(c)(8)]
7. Procedures for the exclusion of COVID-19 cases. [3205(c)(10)]
8. Provisions for reporting, recordkeeping, access to and maintenance of records of the steps taken to implement the COVID-19 Prevention Program. [3205(c)(9)]
9. The criteria to return to work after testing, being exposed, or issuance of a health order. [3205(c)(11)]

**Date By Which Violation Must be Abated:**  
**Proposed Penalty:**

**July 22, 2021**  
**\$375.00**

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Barbara Kim  
Compliance Officer / District Manager