



CITY OF CARSON INJURY AND ILLNESS PREVENTION PROGRAM (IIPP) SUPPLEMENTAL COVID-19 EXPOSURE CONTROL PLAN

This document establishes the City of Carson’s (City) approach to coronavirus (COVID-19). This COVID-19 Exposure Control Plan (Plan) provides a response to enable the City to prepare for and mitigate against the risk of COVID-19 exposure to the City’s office personnel and field employees.

This Plan supplements the City’s Injury and Illness Prevention Program (IIPP). This document is intended to be a “living document” that will evolve as the Center for Disease Control (CDC), the Division of Labor Occupational Safety & Health Administration (Cal/OSHA) and State and Local health officials release new information about COVID-19.

RESOURCES

California Governor Executive Order:

<https://covid19.ca.gov/img/Executive-Order-N-33-20.pdf>

Center for Disease Control and Prevention (CDC):

<https://www.cdc.gov/coronavirus/2019-ncov/index.html>.

Environmental Protection Agency

<https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2-covid-19>

Cal/OSHA

<https://www.dir.ca.gov/dosh/>

BACKGROUND

COVID-19 is a new disease and the CDC continues to learn about how it is spread. At this moment in time, COVID-19 is thought to spread mainly through close contact from person-to-person in respiratory droplets. There are two main routes of transmission of the COVID-19 virus, respiratory and contact. Respiratory droplets are generated when an infected person coughs or sneezes. Any person who is in close contact with someone who has respiratory symptoms (sneezing, coughing) is at risk of being exposed to potentially infective respiratory droplets. Droplets may also land on surfaces where the virus could remain viable; thus, the immediate

environment of an infected individual can serve as a source of contact transmission (*World Health Organization* Interim guidance (March 19, 2020).

COVID-19 PANDEMIC EXPOSURE/AIRBORNE ILLNESS PLAN

The City has developed this plan to help minimize and prevent employee exposure to the Coronavirus (COVID-19). The plan was created on 06/21/2020. Our plan will be updated based on operational needs and/or safety and health agency updates.

To help employers determine appropriate precautions, the Occupational Safety and Health Administration (Fed/OSHA) has divided job tasks into four risk exposure levels: very high, high, medium, and lower risk:

- Very high exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19 during specific medical, postmortem, or laboratory procedures. Workers in this category include paramedics performing aerosol-generating procedures.
- High exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19. Workers in this category include medical transport workers (e.g., ambulance vehicle operators, etc.) moving known or suspected COVID-19 patients in enclosed vehicles.
- Medium exposure risk jobs include those that require frequent and/or close contact (i.e., within 6-feet over a cumulative period of 15 minutes or more within a 24-hour period) with people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients. In areas without ongoing community transmission, workers in this risk group may have frequent contact with travelers who may return from international locations with widespread COVID-19 transmission. In areas where there is ongoing community transmission, workers in this category may have contact with the general public (e.g., schools, high population-density work environments, some high-volume retail settings).
- Lower exposure risk (caution) jobs are those that do not require contact with people known to be, or suspected of being, infected with SARS-CoV-2 nor frequent close contact (i.e., within 6-feet over a cumulative period of 15 minutes or more within a 24-hour period) with the general public. Workers in this category have minimal occupational contact with the public and other coworkers.

According to Fed/OSHA, all City employees will likely fall in the lower exposure risk (caution) or medium exposure risk levels. The City has implemented measures to reduce infection risk and will provide training to employees on COVID-19 infection prevention methods.

DESIGNATION OF RESPONSIBILITY

The City designates one person to have overall responsibility to administer this Plan. The City has ensured that this person is knowledgeable in principles and practices as they apply to our facilities, services, and operation.

The administrators of the Plan are:

- David Roberts, Assistant City Manager-Administrative Services has overall implementation of the IIPP
- Faye Moseley, Director of Human Resources & Risk Management advises and assists management in utilization and deployment of employees
- Roobik Galoosian, Risk Management is the IIPP Administrator and has daily implementation of the IIPP

The administrator is responsible for ensuring the following:

- Communicating this Plan to all City employees;
- Disseminating COVID-19 Safety Communications to all City employees and Bargaining Units;
- Engaging City employees to solicit their feedback and concerns;
- Implementing the COVID-19 preventive measures identified in this plan;
- Convening a COVID-19 Employee Safety Committee to receive, document and respond to employee concerns;
- Communicating Employee COVID-19 cases to health authorities in accordance with federal and state laws; and
- Updating this Plan to incorporate newly published COVID-19 information.

In addition, the administrator will designate one person within each department to act as the point of first contact for communicating information about COVID-19 outbreaks among employees.

RESPONSIBILITIES OF SUPERVISORS

All City Supervisors must be familiar with the Plan and be ready to answer questions from employees. All Supervisors must set the example by following the Plan at all times.

RESPONSIBILITIES OF ALL EMPLOYEES

In order to minimize the spread of COVID-19 in our workplace, everyone must play his or her part. The City has instituted various housekeeping, social distancing, and other best practices as recommended by Cal/OSHA, the CDC, and other agencies to protect against COVID-19. All employees are expected to follow these protocols and be knowledgeable of this Plan.

In addition, employees are expected to report to the Director of Human Resources, Risk Management or Immediate Supervisor if they, or someone they are living with, are experiencing signs or symptoms of COVID-19, as described below.

- Cough
- Shortness of breath or difficulty breathing
- Fever (of at least 100.4 degrees F), Chills
- Muscle pain or body aches
- Sore throat
- New loss of taste or smell
- Fatigue
- Headache
- Congestion or runny nose
- Nausea or vomiting
- Diarrhea

If you, or someone you live with, develop a fever and symptoms of respiratory illness, such as cough or shortness of breath, **DO NOT GO TO WORK**. Call the Human Resources Department, Risk Management or Immediate Supervisor *first*, followed by calling your healthcare provider.

TRAINING

The City will provide trainings to all employees about this Plan. Trainings may be conducted in-person (with number of persons properly spaced), via remote meetings, or via video recordings. The trainings will include an opportunity for employees to ask questions. If employees are absent on the day of their scheduled training, the City will provide a make-up training. Training in the following will be given to all supervisory and non-supervisory employees with expected risk exposure:

The City will provide training on the following topics:

- Information on COVID-19, how to prevent it from spreading, and which underlying health conditions may make individuals more susceptible to contracting the virus.
- Self-screening at home, including temperature and/or symptom checks using CDC guidelines.
- The importance of not coming to work if employees have a frequent cough, fever, difficulty breathing, chills, muscle pain, headache, sore throat, recent loss of taste or smell, or if they or someone they live with have been diagnosed with COVID-19.
- To seek medical attention if their symptoms become severe, including persistent pain or pressure in the chest, confusion, or bluish lips or face. Updates and further details are available on CDC's webpage.
- The importance of frequent handwashing with soap and water, including scrubbing with soap for 20 seconds (or using hand sanitizer with at least 60% ethanol or 70% isopropanol when employees cannot get to a sink or handwashing station, per CDC guidelines).
- The importance of social distancing (minimum 6 feet) both at work and off work time.
- Proper use of face coverings, including:
 - Identifying face coverings that do not protect the wearer and are not personal protective equipment (PPE).
 - Face coverings can help protect people near the wearer, but do not replace the need for physical distancing and frequent handwashing.
 - Employees should wash or sanitize hands before and after using or adjusting face coverings.
 - Avoid touching the eyes, nose, and mouth.
 - Face coverings should be washed after each shift if worn.
 - Face coverings are recommended for anytime proper social distancing cannot be maintained in the office.

RISK ASSESSMENT OF CITY FACILITIES

The City has evaluated City Facilities and has designated the following areas as having a potential increased risk of infection from COVID-19: Council Chambers, City Hall Lobby, Community Center, Human Resources offices, kitchens/break rooms, copy rooms, mail rooms, storage, bathrooms, and conference rooms.

These areas will have the following additional precautions taken:

- Council Chambers, Community Center, break rooms and/or kitchens, as well as conference rooms, will be limited to a maximum number of employees, with signage posted as to the maximum occupancy.
- Human Resources will provide service via telephone, Zoom Meetings and by appointments to limit the number of employees in the department at any given time.
- Bathrooms are under the control of the City in each facility and the City will ensure the bathrooms do not present a potential danger.
- Copy rooms and other high traffic areas will be cleaned and disinfected daily or more often as necessary, per CDC guidelines.
- City Hall and other common areas will have multiple hand sanitizers available to encourage frequent hand washing.
- If social distancing is not possible due to a particular work operation or location, face masks will be provided by the City.

WORKPLACE PREVENTIVE MEASURES

The City had instituted the following preventive measures:

- All employees will be asked to self-check their temperature at home before leaving for work, and not to report to work if they have a temperature greater than 100.4 degrees F or other COVID-19 symptoms.
- Any employee/visitor showing symptoms of COVID-19 will be asked to leave the City and return home.
- Employees must maintain social distance of 6 feet at all times in the workplace, when possible.
- Until further notice, employees should not congregate in offices, conference rooms, and break/lunchrooms and other areas; unless a minimum distance of 6-feet from other individuals can be maintained.
- All meetings will be conducted by telephone or video conference, if possible.
- If in-person meetings are required, groups will be limited to 8 persons and 6 feet separation will be maintained.

- Employees are encouraged to minimize or eliminate ride-sharing. If practicable, employees should not use the same vehicle during their shift. If not practicable, employees should use face covering while ridesharing.
- Employees will be encouraged to stagger breaks and lunches, if practicable, to reduce the size of any group at any one time to less than 8 people with social distancing (minimum 6 feet).
- Employees using break rooms should be respectful of others and space out as appropriate to maintain social distancing (approximately every other table).
- Employees should limit sharing of equipment with each other, unless absolutely necessary. This includes pens, paper, laptops, cell phones, utensils, cups, outdoor tools, etc.
- Employees are encouraged to bring their own water bottles instead of using a common water source.
- Employees are required to wear a face cloth covering or mask that completely covers the nose and mouth when indoors to further mitigate against the spread of COVID-19 while in the City of Carson. Exceptions to the use of face coverings in the workplace include the following:
 - When the employee is alone in a room.
 - When employee is eating or drinking at the workplace, provided employee is 6 feet away from others and outside air supply to the area, if indoors, is maximized to the extent possible.
 - IF an employee cannot wear face coverings due to a medical condition or disability, or who is hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.
- Routine cleaning and disinfecting of shared workplace equipment and furniture will be performed at least daily.
- An employee will be assigned to inspect and to evaluate the workplace in each office, to ensure the above protocols are being adhered to, and that proper hygiene and cleaning products are readily available.

In addition, all employees will be expected to follow the below preventative measures:

- Frequently wash your hands with soap and hot water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% ethanol or 70% isopropanol.
- Maintain social distancing, a minimum of 6 feet.
- Avoid touching your face, eyes, nose, or mouth with unwashed hands.

- Follow appropriate respiratory etiquette, which includes covering coughs and sneezes (preferably with a disposable tissue).
- Avoid close contact with people who are sick.
- Avoid sharing personal items with co-workers (i.e. phones, laptops, outdoor tools, notepads, pens, pencils, etc.).
- Hand sanitizer will be placed in multiple locations throughout City facilities and in conference rooms to encourage hand hygiene.
- Disinfecting products, disposable gloves and hand sanitizer or equivalent supplies will be provided to each department to clean commonly used surfaces. Report low supplies of tissue, hand sanitizer, and disinfecting agents.

CLEANING AND DISINFECTING PROCEDURES

The City of Carson is following the CDC and County of Los Angeles Department of Public Health guidelines regarding cleaning and disinfecting workplaces. The following procedures will be followed in conducting cleaning and disinfecting:

- All City facilities will have COVID-19 safety guidelines and handwashing instructions.
- All restroom facilities will be cleaned at the scheduled interval and handwashing stations will be stocked with soap, hand sanitizer, and paper towels.
- All frequently touched surfaces will be cleaned regularly (e.g., door handles, counters, tables, toilets, faucets, sinks, etc.).
- All meeting rooms and common areas must be cleaned at least daily, or more often as necessary, and disinfected after each use. The City will post a cleaning schedule.
- Employees should notify all contractors and vendors who will arrive and/or work on-site of facility current policies as described.
- The City will [use products that meet EPA's criteria for use against SARS-CoV-2](#), and are appropriate for the surface.
- The City will clean and disinfect frequently touched objects and surfaces such as workstations, keyboards, telephones, outdoor tools, handrails, doorknobs and other frequently touched objects.
- The City will clean shared spaces such as break/lunchrooms after use but no less than once per day.
- Trash will be removed frequently by someone wearing disposable gloves.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Based on current information published by the CDC, employees should use standard practices, practice basic hygiene precautions, and wear personal protective equipment (PPE) as prescribed for current work assignments. In accordance with the City's IIPP, employees are required to protect themselves from hazardous exposures and air borne conditions by using the proper PPE when required or necessary to complete their current tasks. The City provides puncture-resistant gloves as well as face and eye protection to prevent worker exposure to job hazards. To prevent COVID-19 exposure, the City is requiring its employees to continue using these PPE preventions. The City is actively monitoring the CDC, Cal/OSHA, Los Angeles County Department of Public Health and State and Local health offices for emerging PPE COVID guidance. The City will update this plan when these agencies public new information and guidance.

WORKPLACE ALTERATIONS

Due to the variety of workspaces present in the City, the administrator will work with each Supervisor in order to ensure that each workspace is laid out to ensure maximum protection from COVID-19 spread. In all cases, such alterations will focus on maintaining at least 6 feet separation between individuals, minimizing close contact between employees and visitors to the City, and reminding employees and visitors of the importance of social distancing and face coverings.

Members of the Public, Contractors, Vendors and Visitors

The following guidelines are applicable to any areas where members of the public, contractors, vendors, or visitors may come into contact with City employees.

- Applicable [print resources](#) are available on the CDC's website informing the public and employees about COVID-19. This information will also be posted at facility entrances and throughout City facilities.
- Signage will be posted at public facility entrances to inform the public that they should avoid entering if they, or someone they have come into contact with, have any COVID-19 symptoms or have tested positive for COVID-19, that they must maintain a minimum 6-foot distance from one another, and that they must wear a face covering at all times.
- If required by the Los Angeles County Department of Public Health, a copy of the social distancing protocol will be posted at each facility entrance.
- Where required by local health authorities, facility visitors will be asked to wear a face covering.
- Hand sanitizer dispensers will be available at facility entrances, public counters, and waiting areas. If feasible, the dispensers will be touchless.

- Tissue boxes will be available throughout public areas of facilities.
- The City shall limit the number of visitors in a facility at any one time. This will allow for proper social distancing.
- The City will implement one-way control of visitor flow in and out of facilities, where possible.
- Where feasible, the City will set-up a reception desk at facility entrances to check-in visitors.
- The City may establish formalized visitor protocols. Controlled access into a facility may include signage for phone-in entry.
- Where possible, the City will offer certain services to the public via video conferencing platforms.
- The City will place tape or other markings at least 6-feet apart in customer line areas inside facilities and on walkways at public entrances with signs directing visitors to use the markings to maintain distance.
- Where possible, plexiglass screens or similar dividers will be installed at reception or check-in areas. The screens will be of sufficient dimensions to limit the spread of airborne droplets and should be of proper length to accommodate tall individuals. The screens will allow papers/items to be passed under them with minimum exposure/opening.
- The use of communal pens, clipboards, and other items will be limited as much is practical. If not practical, reception desk staff will have clearly labeled pen receptacles (“DISINFECTED” and “USED/DO NOT TOUCH”). Staff will monitor the use of community pens and advise visitors to return the pens to the used receptacle after use to prevent cross-contamination with disinfected items. Staff will disinfect all other communal items when returned by visitors. Staff should also remind customers of hand sanitizer available for their use.
- The number of staff at reception desks at any given time will be reduced.
- Seating in reception waiting areas will be rearranged, limited, or removed to maintain social distancing.
- Magazines and other communal items normally available at reception areas will be removed to maintain hygiene.
- Employees are instructed to maintain at least 6-feet of distance from the public and visitors, except employees may momentarily come closer when necessary to accept payment, deliver goods or services, or as otherwise necessary. In such situations, the employees should ensure that both they and the member of the public are wearing face coverings.

Contractors and vendors are allowed and able to work on-site as long as they agree to follow all aspects of this Plan applicable to City employees, including 1) wearing a face covering, and 2) maintaining social distancing measures. Employees are responsible for notifying contractors and vendors of the City's protocols.

The City strongly discourages employees from inviting guests or other visitors to City facilities at this time.

Work Areas

The following guidelines are applicable to all employee work areas.

- Workstations will allow for social distancing between employees. Chairs, monitors, and other office equipment will be removed from certain workstations to maintain social distancing, and to prevent unoccupied workstation use.
- To meet the 10-person maximum gathering rule, extra chairs in conference rooms will be removed. Signage indicating the maximum number of individuals allowed in conference rooms will be posted.
- In settings where multiple individuals may share one computer or other equipment, employees should wear gloves; the shared computer and equipment will need to be disinfected before and after each individual use, at a minimum daily.
- Seating and office use will remain assigned until the threat of COVID-19 virus transmission is reduced.
- Vacant offices may be used as temporary offices for employees that may not be able to maintain social distance.
- Any workplace reconfiguration will allow for proper ingress/egress. Where applicable, the City will evaluate floorplan layouts and implement one-way hallways or paths throughout the workplace to limit employees having to walk past each other.
- The City may limit the number of employees allowed in elevators or restrooms at any given time. Signage indicating the maximum number of individuals allowed in an elevator will be posted.
- When using copy machines, scanners, and other office equipment, employees are encouraged to use disposable gloves or use individual stylus for touch screen machines, if possible. Employees should wash their hands or use hand sanitizer after use of communal equipment.
- If impractical to temporarily remove from use, shared coffee makers, water dispensers, and other kitchen items must be disinfected before and after each use.
- Until further notice, employees are asked to refrain from bringing in shared food items (e.g., bagels, pastries, fruit, etc.), unless pre-packaged.

INVESTIGATING AND RESPONDING TO POSSIBLE COVID-19 ILLNESS IN THE WORKPLACE

Upon learning of possible COVID-19 exposure in the workplace, the Supervisor, Director of Human Resources or Risk Management will investigate to determine if the exposure was work-related or not. If determined to be work-related, notification will be sent to Cal/OSHA and the Los Angeles County Public Health Department, as necessary. The Human Resources Department will investigate the potential source of the illness, identify if any potential deficiencies in the Plan exist, and adjust the Plan as necessary.

In addition, should an employee test positive for or otherwise be diagnosed with COVID-19, the Director of Human Resources and Risk Management will be responsible to identify close contacts* (**those within 6-feet over a cumulative period of 15 minutes or more within a 24-hour period**) starting from 2 days before onset of symptoms, and notify those employees that they were possibly exposed to the virus. These employees, along with the infected employee, will be sent home to self-isolate pursuant to CDC guidelines.

*Note, the identity of the infected employee/individual will not be disclosed to other employees but will be used to identify other employees who may have been in close contact with the infected individual.

Employees with Suspected Exposure but Asymptomatic

Any employee who reports an actual or suspected exposure to COVID-19 and are asymptomatic will be required to self-quarantine for up to a minimum of 10-14 days from the date of exposure. The employee may telecommute, if possible and approved by the City Manager or designee.

The employee may return to work after the self-quarantine period has been completed and the employee remains asymptomatic for the entire duration of the quarantine period. The employee may choose to provide proof of a negative result to Human Resources, but such negative test result will not affect an employee's return to work earlier than the quarantine period.

If the employee develops symptoms during the quarantine period, the employee will be required to meet the criteria in the next section below prior to returning to work.

Symptomatic Employee who has not Tested Positive

Any employee who has not tested positive for COVID-19, but are symptomatic will be required to self-quarantine for a minimum of 10-14 days from the date symptoms first appeared. The symptomatic employee may telecommute, if possible and approved by the City Manager or designee. After the completion of the necessary self-quarantine period, employees may return to work after meeting the criteria below:

- The employee has been free of fever (100.4° F or greater) for at least 24 hours without the use of fever reducing medicines;

- Any other symptoms have significantly improved;
- At least 10 days have passed since any COVID-19 symptoms appeared; and
- The employee has complied with all directives provided by their health care provider.

The employee is required to provide Human Resources with appropriate certification from their healthcare provider and may be required to provide a negative test result. If an employee is reasonably unable to obtain timely certification from a health care provider, the employee may complete and submit an appropriate self-certification.

However, if the employee receives a doctor's written diagnosis that the illness is not COVID-19, the employee can return to work when 1) he/she is fever-free without medication for at least 24 hours; 2) has met any other standards set by his/her health care provider; and 3) he/she contacts Human Resources for approval to return to work.

Employees who Test Positive

Any employee who tests positive is required to isolate at home per Los Angeles County Health orders. Any employee(s) that had close contact (**those within 6-feet over a cumulative period of 15 minutes or more within a 24-hour period**) with the ill employee in the last 48 hours prior to the ill employee's appearance of symptoms, or, if asymptomatic, 48 hours prior to the ill employee's testing for COVID-19, will be identified, immediately notified and assessed above. The City will disinfect the employee's workplace, including department vehicle (if applicable), desk space, and equipment per CDC guidelines on cleaning and disinfection.

Prior to returning to work, the employee is required to provide Human Resources with appropriate certification from their healthcare provider that the employee is safe to return to work or self-certify that they meet the following criteria:

- If symptomatic during any time of the isolation period: the employee has been free of fever (100.4° F or greater) for at least 24 hours without the use of fever reducing medicines; and any other symptoms have significantly improved; and at least 10 days have passed since any COVID-19 symptoms appeared.
- If asymptomatic during the entire time of the isolation period: at least 10 days have passed since being tested for COVID-19.

If an employee is unable to telecommute, coordinate with Human Resources to assess whether the employee is entitled to Emergency Paid Sick Leave under the First Families Coronavirus Response Act (FFCRA).

COMMUNICATION WITH EMPLOYEES

The City will provide employees regular informational updates via remote meetings, phone calls and electronic mails. Most communications and updates to employees on COVID-19 at the

workplace will be by email. The City may also post such communications on the employee's intranet or at City facilities. The City's goal is to ensure an effective two-way communication with employees, in a form they can readily understand.

The City communications may include the following types of information:

- Information about COVID-19 hazards employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures;
- Newly published CDC and Cal/OSHA COVID-19 prevention techniques;
- New employee COVID-19 personnel policies and procedures, including notices regarding employee pay, benefits, and testing for work-related COVID-19 cases or potential exposures;
- City operational status, and changes in hours of operations, work assignments and employee work schedules;
- Essential meeting schedule (i.e. COVID-19 and worker safety trainings);
- Who employees should report COVID-19 symptoms and possible hazards to, and how such information such be communicated;
- That employees can report symptoms and hazards without fear of reprisal;
- Where testing is not required, employees can access COVID-19 testing at any testing site. Testing sites can be found at <https://covid19.ca.gov/get-tested/>;
- In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test; and
- Requests for employee involvement to update this Plan.

Procedures to Communicate with Employees and Other Employers Regarding Infection - to ensure City employees use appropriate precautions, the City will communicate with them regarding the suspected or confirmed infectious disease status of persons with whom they were exposed during their duties.

EVALUATIONS AND WORKPLACE INSPECTIONS

Any plan must be routinely evaluated in order to gauge its effectiveness. In this regard, the City's Custodian staff will maintain and document daily logs of the cleaning protocol with oversight by the Supervisors and Public Works Landscape & Building Maintenance Superintendent. A hard copy of the log will be available at each workplace building location. The Risk Management Department will inspect each workplace building location on a monthly basis and will record the

results of the inspection on an inspection sheet. The inspection sheet will cover items such as proper handwashing facilities, readily available hand sanitizer, observation of whether proper social distancing is being performed, whether common, high-use areas are being properly disinfected, and whether employees are overall knowledgeable of the Plan. The results of the inspections, including any deficiencies, will be recorded on the inspection sheets. The Risk Management Department will report any non-compliance issues to the Department Director if employees are not observing social distancing; to Public Works if common areas are not being properly disinfected, etc. Issues that re-occur or are not addressed after repeated non-compliance notification, will be referred to the City Manager's Office, IIPP Plan Administrator, and the Assistant City Manager-Administrative Services.