



COVID-19 Prevention Program (CPP)

I. PURPOSE

The purpose of the School's COVID-19 Prevention Program (CPP) is to provide employees a healthy and safe workplace as required under the California Occupational Safety and Health Act (Labor Code §§ 6300, *et seq.*) and associated regulations (8 C.C.R. § 3205).

Nothing in this CPP precludes the School from complying with federal, state, or local laws or guidance that recommends or require more prescriptive and/or restrictive measures than are provided herein.

II. SCOPE

This CPP applies to all School employees except for employees who are teleworking.

III. DEFINITIONS

For the purposes of the CPP, the following definitions shall apply:

“COVID-19” means coronavirus disease, an infectious disease caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).

“COVID-19 case” means a person who either: (1) Has a positive “COVID-19 test” as defined in this section; (2) Is subject to COVID-19-related order to isolate issued by a local or state health official; or (3) Has died due to COVID-19, in the determination of a local health department or per inclusion in the COVID-19 statistics of a county. A person is no longer a “COVID-19 case” when a licensed health care professional determines that the person does not have COVID-19, in accordance with recommendations made by the California Department of Public Health (CDPH) or the local health department pursuant to authority granted under the Health and Safety Code or title 17, California Code of Regulations to CDPH or the local health department.

“Close contact COVID-19 exposure” means being within six (6) feet of a COVID-19 case for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the “high-risk exposure period” as defined here. This definition applies regardless of the use of face coverings.

“COVID-19 hazard” means exposure to potentially infectious material that may contain SARS-CoV-2, the virus that causes COVID-19. Potentially infectious materials include airborne droplets, small particle aerosols, and airborne droplet nuclei, which most commonly result from a person or persons exhaling, talking or vocalizing, coughing, sneezing, or procedures performed on persons which may aerosolize saliva or respiratory tract fluids, among other things. This also includes objects or surfaces that may be contaminated with SARS-CoV-2.

“COVID-19 symptoms” means one of the following: (1) fever of 100.4 degrees Fahrenheit or higher or chills; (2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches; (6) headache; (7) new loss of taste or smell; (8) sore throat; (9) congestion or runny nose; (10) nausea or vomiting; or (11) diarrhea, unless a licensed health care professional determines the person’s symptoms were caused by a known condition other than COVID-19.

“COVID-19 test” means a viral test for SARS-CoV-2 that is both: (1) Approved by the United States Food and Drug Administration (FDA) or has an Emergency Use Authorization from the FDA to diagnose current infection with the SARS-CoV-2 virus; and (2) Administered in accordance with the FDA approval or the FDA Emergency Use Authorization as applicable.

“Exposed workplace” means any work location, working area, or common area at work used or accessed by a COVID-19 case during the high-risk period, including bathrooms, walkways, hallways, aisles, break or eating areas, and waiting areas.

The exposed workplace does not include buildings or facilities not entered by a COVID-19 case. Effective January 1, 2021, the “exposed workplace” also includes but is not limited to the “worksite” of the COVID-19 case as defined by Labor Code section 6409.6(d)(5).

“Face covering” means a tightly woven fabric or non-woven material with no visible holes or openings, covering the nose and mouth.

“High-risk exposure period” means the following time period: (1) For persons

who develop COVID-19 symptoms: from two (2) days before they first develop symptoms until ten (10) days after symptoms first appeared, and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved; or (2) For persons who test positive who never develop COVID-19 symptoms: from two (2) days before until ten (10) days after the specimen for their first positive test for COVID-19 was collected.

IV. PROGRAM

A. SYSTEM FOR COMMUNICATING WITH SCHOOL EMPLOYEES

1. Reporting COVID-19 Symptoms, Possible COVID-19 Close Contact Exposures, and Possible COVID-19 Hazards at School Worksites and Facilities The School's policy requires that employees immediately report to the COVID-19 liaison, Osiris Romero, and the Director of Business and Operations, Kim Kanetis, any of the following: (1) the employee's presentation of COVID-19 symptoms; (2) the employee's possible COVID-19 close contact exposures; (3) possible COVID-19 hazards at the School's worksites or facilities.

The School will not discriminate or retaliate against any employee who makes such a report.

2. Accommodations Process for Employees at Increased Risk of Severe COVID-19 Illness

The School's policy is to provide an accommodation process for employees who can demonstrate that they are or may be at higher risk of severe illness from COVID-19.

The CDC identifies the following individuals as being at an increased risk of severe COVID-19 illness, as set forth in the CDC website:

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

<https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/older-adults.html>

School employees are encouraged to review the list of medical conditions and other conditions and factors identified by the CDC as placing an

individual at increased risk of severe illness from COVID-19. To request an accommodation under the School's policy, employees may make a request with the Director of Business and Operations.

3. COVID-19 Testing

The School will require that employees who report to work at School be tested for COVID-19. It is considered by Winston School to be both job-related and a business necessity.

The School will also inform employees of the possible consequences of a positive COVID-19 test, which may include, but is not limited to, a requirement that the employee not report for work at the School during the high-risk exposure period and satisfying the minimum criteria to return to work, as defined in Section IV.K.

The School has adopted policies and procedures that ensure the confidentiality of employees and comply with the Confidentiality of Medical Information Act ("CMIA"). Specifically, the School will keep confidential all personal identifying information of COVID-19 cases or persons with COVID-19 symptoms unless expressly authorized by the employee to disclose such information or as other permitted or required under the law.

4. COVID-19 Hazards

After January 1, 2021, the School will notify employees and employers of subcontracted employees of any potential COVID-19 exposure at a School worksite or facility where a COVID-19 case and employee were present on the same day.

The School will notify employees of such potential exposures within one (1) business day, in a way that does not reveal any personal identifying information of the COVID-19 case.

The School will also notify employees of cleaning and disinfecting measures the School is undertaking in order to ensure the health and safety of the worksite or facility where the potential exposure occurred.

B. IDENTIFICATION AND EVALUATION OF COVID-19 HAZARDS AT SCHOOL WORKSITES AND FACILITIES

1. Screening Employees for COVID-19 Symptoms

The School has adopted screening protocols, including screening employees upon entering campus daily for COVID-19 symptoms and temperature checks.

2. Responding to Employees with COVID-19 Symptoms

Should an employee present COVID-19 symptoms before arriving at school or during his/her screening, the School will instruct the employee to remain at or return to their home or place of residence and not report to work until such time as the employee satisfies the minimum criteria to return to work, as outlined in Section IV.K.

The School will advise the employee of any leaves they may be entitled to during this self-quarantine period.

Further, the School has adopted policies and procedures that ensure the confidentiality of employees and compliance with the CMIA. Specifically, the School will not disclose to other employees, except for those who need to know, the fact that the employee is experiencing symptoms associated with COVID-19.

3. The School's Response to COVID-19 Cases

In the event that a Winston employee tests positive for COVID-19 or is diagnosed with COVID-19 by a healthcare provider, the School will instruct the employee to remain at or return to their home or place of residence and not report to work until such time as the employee satisfies the minimum criteria to return to work outlined in Section IV.K.

The School will advise the employee of any leaves they may be entitled to during this self-isolation period.

The School will comply with all reporting and recording obligations as required under the law, including, but not limited to, reporting the COVID-19 case to the following individuals and institutions as required based on the individual circumstances: (1) the local health department; (2) Cal/OSHA; (3) employees who were present on the School's campus when the COVID-19 case was present; (4) the employers of subcontracted employees who were present at the School's worksite or facility; and (5) the Director of Business and Operations as the School's workers' compensation plan administrator.

If possible, the School will interview the COVID-19 case in order to ascertain the nature and circumstances of any contact that the employee may have had with other employees during the high-risk exposure period. If the School determines any close contact COVID-19 exposures, the School will instruct those employees to remain at their home or place of residence and not report to work until such time as the employees satisfy the minimum criteria to return to work outlined in Section IV.K.

The School has adopted policies and procedures that ensure the confidentiality of employees and compliance with the CMIA. Specifically, the School will not disclose to other employees, except for those who need to know, the fact that the employee tested positive for or was diagnosed with COVID-19. Further, the School will keep confidential all personal identifying information of COVID-19 cases or persons unless expressly authorized by the employee to disclose such information or as otherwise permitted or required under the law.

4. Workplace-Specific Identification of COVID-19 Hazards

The School conducted a workplace-specific assessment of all interactions, areas, activities, processes, equipment, and materials that could potentially expose employees to COVID-19 hazards.

As part of this process, the School identified places and times when employees and individuals congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not, including, for example, during meetings or trainings, in and around entrances, bathrooms, hallways, aisles, walkways, break or eating areas, and front office.

As part of this process, the School identified potential workplace exposure to all persons at Winston, including employees, employees of other entities, members of the public, customers or clients, and independent contractors. The School considered how employees and other persons enter, leave, and travel through the School campus, in addition to addressing employees' fixed workspaces or workstations.

As part of this process, the School assumes all persons, regardless of symptoms or negative COVID-19 test results, as potentially infectious.

5. Maximization of Outdoor Air and Air Filtration

For indoor areas on campus, Winston evaluated how to maximize the quantity of outdoor air and whether it is possible to increase filtration efficiency to the highest level compatible with the worksites and facilities' existing ventilation systems. Measures have included installing air cleaners and opening windows for cross-ventilation.

6. Compliance with Applicable State and Local Health Orders

The School monitors applicable orders and guidance from the State of California and the local health department related to COVID-19 hazards and prevention, including information of general application and information specific to the School's location and operations.

The School fully and faithfully complies with all applicable orders and guidance from the State of California and the local health department.

7. Evaluation of Existing COVID-19 Prevention Controls and Adoption of Additional Controls

Periodically, the School will evaluate existing COVID-19 prevention controls at the workplace and assess whether there is a need for different and/or additional controls.

This includes evaluating controls related to the correction of COVID-19 hazards, physical distancing, face coverings, engineering controls, administrative controls, and personal protective equipment ("PPE").

8. Periodic Inspections

The School conducts periodic inspections of its facilities as needed to identify potentially unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with the School's COVID-19 policies and procedures.

C. INVESTIGATING AND RESPONDING TO COVID-19 CASES ON-SITE

1. Procedure to Investigate COVID-19 Cases

The School has a procedure for investigating COVID-19 cases in the workplace. As provided below, the procedure provides for the following: (1) the verification of COVID-19 case status; (2) receiving information

regarding COVID-19 test results; (3) receiving information regarding the presentation of COVID-19 symptoms; and (4) identifying and recording all COVID-19 cases.

2. Response to COVID-19 Cases

As provided above in Section IV.B.3., if an employee tests positive for COVID-19 or is diagnosed with COVID-19 by a licensed health care provider, the School will instruct the employee to remain at or return to their home or place of residence and not report to work until such time as the employee satisfies the minimum criteria to return to work outlined in Section IV.K.

a. Contact Tracing

The School Liaison and Executive Assistant are designated as staff liaisons responsible for responding to COVID-19 concerns and coordinating the documentation and tracking possible exposure to notify local health officials, staff, and families promptly and responsibly.

If possible, the School will interview the COVID-19 case in order to ascertain the following information: (1) the date on which the employee tested positive, if asymptomatic, or the date on which the employee first presented COVID-19 symptoms, if symptomatic; (2) the COVID-19 cases recent work history, including the day and time they were last present on the School campus; and (3) the nature and circumstances of the COVID-19 case's contact with other employees during the high-risk exposure period, including whether there was any close contact COVID-19 exposure.

If the School determines that there were any close contact COVID-19 exposures, the School will instruct those employees to remain at their home or place of residence and not report to work until such time as the employees satisfy the minimum criteria to return to work outlined in Section IV.K.

b. Reporting the Potential Exposure to Other Employees

The School will comply with all reporting and recording obligations as required under the law, including, but not limited to, reporting the COVID-19 case to the following individuals and institutions as required based on the individual circumstances: (1) employees who were present at a School campus when the COVID-19 case

was present; and (2) subcontracted employees who were present at the School campus.

c. Free COVID-19 Testing for Close Contact Exposures The School will provide COVID-19 testing at no cost to employees during their working hours to all employees who had potential close contact COVID-19 exposure at the School campus.

d. Leave and Compensation Benefits for Close Contact Exposures The School will provide these employees with information regarding COVID-19-related benefits. The employee may be entitled under applicable federal, state, or local laws. This includes any benefits available under workers' compensation law, the federal Families First Coronavirus Response Act (FFCRA), Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, local governmental requirements, the School's own leave policies, and leave guaranteed by contract.

The School will continue to provide and will maintain these employees' earnings, seniority, and all other employee rights and benefits, including the employee's right to their former job status, as if the employee had not been removed from their job.

The School may require that these employees use employer-provided employee sick leave benefits for this purpose and consider benefit payments from public sources in determining how to maintain earnings, rights, and benefits, where permitted by law and when not covered by workers' compensation.

e. Investigation to Determine Whether Workplace Conditions Contributed to COVID-19 Exposure

The School will investigate to determine whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure to COVID-19 hazards.

3. Confidential Medical Information

The School will protect the confidentiality of the COVID-19 case and will not disclose to other employees, except for those who need to

know, the fact that the employee tested positive for or was diagnosed with COVID-19.

The School will keep confidential all personal identifying information of COVID-19 cases unless expressly authorized by the employee to disclose such information or as otherwise permitted or required under the law.

D. CORRECTION OF COVID-19 HAZARDS AT SCHOOL WORKSITES AND FACILITIES

The School will implement effective policies and/or procedures for correcting unsafe or unhealthy conditions, work practices, policies, and procedures in a timely manner based on the severity of the hazard.

This includes, but is not limited to, implementing controls and/or policies and procedures in response to the evaluations conducted related to identifying and evaluating COVID-19 hazards and investigating and responding to COVID-19 cases in the workplace. This includes implementing controls related to physical distancing, face coverings, engineering controls, administrative controls, and personal protective equipment (PPE).

E. TRAINING AND INSTRUCTION OF EMPLOYEES

The School provides information on safety protocols such as handwashing, mask-wearing, social distancing, and cleaning regularly, as well as updates on minimizing high-risk activities such as travel and gatherings. Meetings (virtual) are held with staff and faculty to update protocols as needed given changing guidance from the County or State.

1. COVID-19 Symptoms

The School provided employees training and instruction on the COVID-19 symptoms, including advising employees of COVID-19 symptoms, which include the following: (1) fever of 100.4 degrees Fahrenheit or higher or chills; (2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches; (6) headache; (7) new loss of taste or smell; (8) sore throat; (9) congestion or runny nose; (10) nausea or vomiting; or (11) diarrhea unless a licensed health care professional determines the person's symptoms were caused by a known condition other than COVID-19.

The School monitors and adheres to guidance by the CDC concerning COVID-19 symptoms, including as provided at the following web

address:

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

The School advises employees in the event that the CDC makes any changes to its guidance concerning such symptoms.

The School provided employees instruction on the importance of not coming to work and obtaining a COVID-19 test if the employee exhibits COVID-19 symptoms.

2. School's COVID-19 Policies and Procedures

The School provides regular updates to employees on the School's policies and procedures to prevent COVID-19 hazards at School worksites and facilities and protect School employees.

3. COVID-19 Related Benefits

The School advised employees of the leaves they may be entitled under applicable federal, state, or local laws. This includes any benefits available under workers' compensation law, the FFCRA, and Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, the School's own leave policies, and leave guaranteed by contract.

Further, when an employee requires leave or is directed not to report to work by the School, the School will advise the employee of the leaves to which the employee may be entitled to that specific reason.

4. Spread and Transmission of the Virus that Causes COVID-19

The School advised employees that COVID-19 is an infectious disease that can be spread through the air when an infectious person talks or vocalizes, sneezes, coughs, or exhales; that COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth, although that is less common; and that an infectious person may have no symptoms.

The School further advised employees of the fact that particles containing the virus can travel more than six (6) feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, including handwashing, in order to be

effective.

5. Methods and Importance of Physical Distancing, Face Coverings, and Hand Hygiene

Through faculty and staff meetings, published announcements, and emails, the School continues to advise employees of the methods and importance of physical distancing, face coverings, and hand hygiene, including handwashing.

Specifically, the School trained and instructed employees on the importance of frequent handwashing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or handwashing facility.

Further, the School trained and instructed employees on the proper use of face coverings and the fact that face coverings are not respiratory protective equipment.

F. PHYSICAL DISTANCING

The School requires that all employees be separated from other persons by at least six (6) feet, except where the School can demonstrate that six (6) feet of separation is not possible and where there is momentary exposure while persons are in movement.

The School has adopted several methods by which it increases physical distancing, including, but not limited to, the following: (1) as appropriate providing employees the option to telework or engage in other remote work arrangements; (2) reducing the number of persons in an area at one time, including visitors; (3) posting visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel; (4) adopting staggered arrival, departure, work, and break times; and (5) limiting the number of employees in common spaces to allow greater distance between employees. When it is not possible for employees to maintain a distance of at least six (6) feet, the School requires individuals to be as far apart as possible.

G. FACE COVERINGS

1. Face Covering Requirement

The School provides face coverings to employees and requires

employees and individuals to wear such face coverings at School facilities.

School policy adheres to orders and guidance provided by the CDPH and the local health department, including as provided at the following web address:

<https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/guidance-for-face-coverings.aspx>

The School's policy on the use of face coverings ensures that they are worn over the nose and mouth when indoors, when outdoors and less than six (6) feet away from another person, and where required by orders from the CDPH or local health department.

The School's policy requires that face coverings are clean and undamaged. The School's policy allows for face shields to be used to supplement and not supplant face coverings.

The School's policy provides for the following exceptions to the face coverings requirement:

- a. When an employee is alone in a room.
- b. While eating and drinking at the workplace, provided employees are at least six (6) feet apart and have an outside air supply to the area, if indoors, that has been maximized to the extent possible.
- c. Employees wearing respiratory protection in accordance with section 5144 or other title 8 safety orders (8 C.C.R. 5144 is available at the following web address:
<https://www.dir.ca.gov/title8/5144.html>).
- d. Employees who cannot wear face coverings due to a medical or mental health condition or disability or are hearing-impaired or communicating with a hearing-impaired person. Any such accommodation is handled on an individual basis as not wearing a face covering may constitute an undue hardship to the School because of the threat posed to the health and safety of the workplace and other employees and students.

- e. Specific tasks that cannot feasibly be performed with a face covering. This exception is limited to the time period in which such tasks are being performed. The unmasked employee shall be at least six (6) feet away from all other persons unless unmasked employees are tested at least twice weekly for COVID-19.

H. OTHER ENGINEERING CONTROLS, ADMINISTRATIVE CONTROLS AND PERSONAL PROTECTIVE EQUIPMENT (PPE)

The School provides six feet of distance between all workspaces, desks, eating areas, classroom space, and office spaces.

The School has maximized the quantity of outside air provided 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 letting in outdoor air by other means would cause a hazard to employees.

The School has installed BlueAir air cleaning units in each classroom, which are in operation during the full school day and properly maintained with regular filter changes.

3. Cleaning and Disinfecting Procedures

The School’s cleaning and disinfecting policy requires the following:

- a. Identifying and regularly cleaning and disinfecting frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, and bathroom surfaces. The School has informed employees and authorized employee representatives of cleaning and disinfection protocols, including the planned frequency and scope of regular cleaning and disinfection.
- b. Prohibiting the sharing of personal protective equipment and, to the extent feasible, items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments, and tools. When it is not feasible to prevent sharing, sharing is minimized and such items and equipment are disinfected between uses by different people.
- c. Cleaning and disinfection of areas, material, and equipment used by a

COVID-19 case during the high-risk exposure period.

Further, the School requires that cleaning and disinfecting must be done in a manner that does not create a hazard to employees or subcontracted employees.

4. Evaluation of Handwashing Facilities

In order to protect employees, the School evaluated its handwashing facilities in order to determine the need for additional facilities and provide employees with an effective hand sanitizer. Separate bathrooms were assigned for adult use only and two sink units were added to the campus to provide additional access.

The School has signs posted throughout the campus encouraging employees to wash their hands for at least 20 seconds each time.

The School does not provide hand sanitizers with methyl alcohol.

5. Personal Protective Equipment (PPE)

The School's policy provides for PPE.

The School evaluates the need for PPE, such as gloves, goggles, and face shields, to prevent exposure to COVID-19 hazards and provide such PPE as needed.

In accordance with applicable law, the School evaluates the need for respiratory protection when the physical distancing requirements, as provided herein, are not feasible or are not maintained.

In accordance with applicable law, the School provides and ensures the use of respirators in accordance when deemed necessary by Cal/OSHA through the Issuance of Order to Take Special Action.

In accordance with applicable law, the School will provide and ensure the use of eye protection and respiratory protection when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

I. REPORTING, RECORDKEEPING, AND ACCESS

1. Reporting COVID-19 Cases to the Local Health Department

In accordance with applicable law, the School will report information about all COVID-19 cases at the workplace to the local health department. In addition, the school will notify the local health department if there are three (3) or more laboratory-confirmed cases on COVID-19 in a two (2) week period of employees who reside in different residences.

Further, the School will provide any related information requested by the local health department.

2. Reporting Serious COVID-19 Illnesses and Deaths to Cal/OSHA

In accordance with applicable law, the School will immediately (within 8-hours of notification) report to Cal/OSHA any serious COVID-19-related illnesses or deaths of employees occurring at a School worksite or facility or in connection with any employment.

Further, in accordance with applicable law, the School will record any serious work-related COVID-19-related illnesses or deaths.

3. Maintenance of Records Related to the Adoption of the CPP

In accordance with applicable law, the School will maintain records of the steps taken to implement this CPP.

4. Availability of the CPP for Inspection

The School will make this written CPP available to employees in the School's Business Office and on the employee Google drive. Further, the School will make this written CPP available to Cal/OSHA representatives immediately upon request.

5. Records Related to COVID-19 Cases

The School will keep a record of and track all COVID-19 cases with the following information: (1) employee's name; (2) contact information; (3) occupation; (4) location where the employee worked; (5) the date of the last day at the workplace; and (6) the date of a positive COVID-19 test.

In accordance with the Confidentiality of Medical Information Act ("CMIA") and applicable law, the School will keep the employees' medical information confidential.

In accordance with the CMIA and applicable law, the School will

make this information available to employees with personal identifying information removed. The School will also make this information available as otherwise required by law.

J. EXCLUSION OF COVID-19 CASES

1. Exclusion of COVID-19 Cases from School Worksites and Facilities

The School will ensure that COVID-19 cases are excluded from the workplace until the individual satisfies the minimum return to work criteria provided for in Section IV.K.

2. Exclusion of Employees with Close Contact COVID-19 Exposures from School Worksites and Facilities

The School will exclude employees with close contact COVID-19 exposure from the workplace for 10-14 days after the last known close contact COVID-19 exposure depending on guidance from the health department and medical professionals.

3. Provision of Benefits to Excluded from Work as a Result of a Positive COVID-19 Test or Diagnosis or a Close Contact COVID-19 Exposure

a. Employees Who Are Able to Telework During Isolation or Quarantine Period

The School will allow employees who can telework and are able and available to work to telework during the isolation or quarantine period. The School will provide these employees their normal compensation for the work that they perform for the School during the isolation or quarantine period.

b. Employees Who Are Unable to Telework During Isolation or Quarantine Period

Winston will require that employees who are unable to telework use paid sick leave in order to receive compensation during the isolation or quarantine period. School employees retain their entitlement to elect not to use other earned or accrued paid leave during this time.

For all employees who are subject to isolation or quarantine because of a COVID-19 case or a close contact COVID-19 exposure, the School will maintain the employee's seniority and all

other employee rights and benefits, including the employee's right to their former job status, during the isolation or quarantine period.

The School may consider benefit payments from public sources, including under the FFCRA and Labor Code section 248.1 (until March 31, 2021), in determining how to maintain earnings, rights, and benefits, where permitted by law and when not covered by workers' compensation.

4. Adherence with Laws, Policies, and/or Agreements Providing Excluded Employees Greater Protections

The obligations set forth in this section do not limit any other applicable law or School policy that provides employees with greater protections or benefits.

5. Provision of Information Concerning Benefits to Excluded Employees

At the time of exclusion, the School will provide the excluded employee the information on benefits to which the employee may be entitled under applicable federal, state, or local laws.

This includes any benefits available under workers' compensation law, the FFCRA, Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, [any applicable local requirements], the School's own leave policies, and leave guaranteed by contract.

K. RETURN TO WORK CRITERIA

1. Minimum Criteria to Return to Work for Symptomatic COVID-19 Cases

School policy requires that COVID-19 cases with COVID-19 symptoms remain at their home or place of residence and not report to any School worksite or facility until they satisfy each of the following conditions:

a. At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications;

b. COVID-19 symptoms have improved; and

c. At least ten days have passed since COVID-19 symptoms first appeared.

2. Minimum Criteria to Return to Work for Asymptomatic COVID-19 Cases

School policy requires that COVID-19 cases that tested positive but never developed COVID-19 symptoms not report to School until a minimum of 10 days has passed since the date of specimen collection of their first positive COVID-19 test.

3. COVID-19 Testing Not Required to Return to Work In accordance with CDC guidance concerning symptom-based strategies for discontinuing isolation, the School does not require employees to submit to a COVID-19 test or produce a negative COVID-19 test result to return to work.

4. Minimum Criteria to Return to Work for Employees Directed to Self-Quarantine or Isolate by a State or Local Health Official

If an employee is subject to an isolation or quarantine order issued by a state or local health official, School policy requires that the employee not report to school until the period of isolation or quarantine is completed or the order is lifted.

If the order did not specify a definite isolation or quarantine period, then the period shall be ten days from the time the order to isolate was effective or 14 days from the time the order to quarantine was effective.

5. Allowance by Cal/OSHA for an Employee to Return to Work

If there are no violations of state or local health officer orders for isolation or quarantine, Cal/OSHA may, upon request, allow employees to return to work on the basis that the removal of an employee would create undue risk to a community's health and safety.

In such cases, the School will develop, implement, and maintain effective control measures to prevent transmission in the workplace, including providing isolation for the employee at the School worksite or facility if isolation is not possible, the use of respiratory protection in the workplace.