



COVID-19 Prevention Program (CPP)

I. PURPOSE

The purpose of The Winston School 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 recommend or requires more prescriptive and/or restrictive measures than are provided herein.

II. SCOPE

Unless one of the exceptions provided below applies, this CPP applies to all School employees, including those who are “fully vaccinated.” The following employees are exempt from coverage under the CPP: (1) Employees who are teleworking from home or a location of the employee’s choice that is not under the control of the School; (2) Employees who are working in or at a work location and do not have contact with any other individuals; and (3) Employees who because of their tasks, activities, or work location have occupational exposure as defined by the Aerosol Transmissible Diseases (“ATD”) regulation (i.e., 8 C.C.R. § 5199).

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; (3) Has a positive COVID-19 diagnosis from a licensed healthcare provider; or (4) 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.

“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 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 from procedures performed on persons which may aerosolize saliva or respiratory tract fluids. 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 group” means all employees at a work location, working area, or common area at work, where a COVID-19 case was present at any time during the high-risk exposure period. However, if the COVID-19 case visited a work location, working area, or a common area at work for less than 15 minutes during the high-risk exposure period, and all employees were wearing face coverings at the time the COVID-19 case was present, other people at the work location, working area, or common area would not constitute part of the exposed group. Common areas at work include bathrooms, walkways, hallways, aisles, break or eating areas, and waiting areas. However, places where employees momentarily pass through while everyone is wearing face coverings, without congregating, is not a work location, working area, or a common area at work.

“Face covering” means a surgical mask, a medical procedure mask, a respirator

worn voluntarily, or a tightly woven fabric or non-woven material of at least two layers. A face covering has no visible holes or openings and must cover the nose and mouth. A face covering does not include a scarf, ski mask, balaclava, bandana, turtleneck, collar, or single layer of fabric.

“Fully vaccinated” means the School has documented that the person received, at least 14 days prior, either the second dose in a two-dose COVID-19 vaccine series or a single dose COVID-19 vaccine. Vaccines must be FDA approved, have an emergency use authorization from the FDA, or be listed for emergency use by the World Health Organization (WHO) for persons fully vaccinated outside the United States.

“High-risk exposure period” means the following: For COVID-19 cases who develop COVID-19 symptoms: from two (2) days before they first develop symptoms until each of the following are true: (1) it has been ten (10) days since symptoms first appeared; (2) 24 hours have passed with no fever, without the use of fever-reducing medications; and (3) symptoms have improved. For COVID-19 cases 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. “Respirator” means a respiratory protection device approved by the National Institute for Occupational Safety and Health (“NIOSH”) to protect the wearer from particulate matter, such as an N95 filtering facepiece respirator.

“Worksite,” for the limited purposes of COVID-19 prevention regulations only, means the building, store, facility, agricultural field, or other location where a COVID-19 case was present during the high-risk exposure period. It does not apply to buildings, floors, or other locations of the School that a COVID-19 case did not enter.

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 provides a process for employees to request an accommodation who (1) can demonstrate that they remain at increased risk of severe illness from COVID-19 despite being fully vaccinated; or (2) can demonstrate that they are precluded from being fully vaccinated against COVID-19 due to disability, medical condition, or a sincerely held religious belief. 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.htm>

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 Head of School or Director of Business and Operations.

3. COVID-19 Testing

The School possesses the authority to require that employees who report to work at the School worksites or facilities be tested for COVID-19.

Where the School requires testing, the School has adopted policies and procedures that ensure the confidentiality of employees' medical information 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 otherwise permitted or required under law.

4. COVID-19 Hazards

The School will notify employees and subcontracted employees of any potential COVID-19 exposure at a School worksite or facility where a

COVID-19 case and employees 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 School 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 upon entering campus daily for COVID-19 symptoms.

2. Responding to Employees with COVID-19 Symptoms

Should an employee present COVID-19 symptoms during a School administered screening or a self-screen, the employee must remain at or return to his/her home or place of residence and not report to work until such time as the employee satisfies the minimum criteria in order to return to work (as discussed in Section IV.J. of this CPP).

The School will advise employees of any leaves to which they may be entitled during this self-quarantine period, including, but not limited to COVID-19 Supplemental Paid Sick Leave (“SPSL”).

Further, the School has adopted policies and procedures that will ensure the confidentiality of employees and comply with the CMIA, and the School will not disclose to other employees the fact that the employees presented COVID-19 symptoms.

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

In the event that a Winston School 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 home or place of residence and not report to work until such time as they satisfy the minimum criteria to return to work set forth in Section IV.J.

The School will advise the employee of any leaves to which they may be

entitled during this self-isolation period, including, but not limited to SPSL.

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 5 following individuals and entities 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(s) in order to ascertain the nature and circumstances of any contact that the employee(s) had or may have had with other employees during the high-risk exposure period. 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 set forth in Section IV.J of this CPP.

The School has adopted policies and procedures to promote the confidentiality of employees and comply with the CMIA. Specifically, the School will not disclose to other employees, except for those who need to know, the fact that the employee(s) tested positive for or were 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 employees to disclose such information or as otherwise permitted or required under the law.

4. Workplace-Specific Identification of COVID-19 Hazards

The School periodically conducts 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 identifies places (e.g., work locations, work areas, and common areas) 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 waiting areas.

The School will provide notice of any such potential workplace exposure to all persons at School worksites and facilities, 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' workspaces or workstations.

Further, the School will treat all persons, regardless of the presentation of COVID-19 symptoms or COVID-19 status, as potentially infectious.

5. Maximization of Outdoor Air and Air Filtration

For indoor areas on campus, Winston evaluates how to maximize the ventilation of outdoor air and provide the highest level of filtration efficiency compatible with the worksites and facilities' existing ventilation systems. Measures have included installing High Efficiency Particulate Air (HEPA) filtration units 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 evaluates existing COVID-19 prevention controls at the workplace and assesses 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, including, but not limited to this CPP.

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, which provides for the following: (1) requesting information from employees regarding COVID-19 cases; (2) contact tracing of employees who may have had a close contact COVID-19 exposure; (3) requesting COVID-19 test results from employees who may have had a close contact COVID-19 exposure; (4) requesting information from employees regarding the presentation of COVID-19 symptoms; and (5) 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 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.J of this CPP.

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 case's 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 any such contact qualifies as a close contact COVID-19 exposure

If the School determines that there was or 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 (as discussed in Section IV.J. of this CPP). Further, the School will instruct those employees to be tested for COVID-19, and that the School will provide for such testing during paid time, as discussed in subsection c. below.

b. Reporting the Potential Exposure to Other Employees

The School shall comply with all reporting and recording obligations as required under the law, including, but not limited to, reporting the COVID-19 case to the individuals and entities described below.

Within one (1) business day of the time the School knows of a COVID-19 case, the School will give written notice of a potential workplace exposure to the following individuals: (1) all employees who were present at a School worksite or facility during the COVID-19 case's high-risk exposure period; (2) independent contractors at the worksite or facility during the COVID-19 case's high-risk exposure period; (3) other employers; or (4) authorized representative of any employee at the worksite or facility during the COVID-19 case's high-risk exposure period. The School will provide notice by either personal contact, email, or text message.

The School's notice will not reveal any personal identifying information of the COVID-19 case. The notice will include information about the School's disinfection plan.

c. Free COVID-19 Testing for Close Contact Exposures

The School makes COVID-19 testing available at no cost to employees who had a close contact COVID-19 exposure at a School worksite or facility. The School will offer employees COVID-19 testing during paid time, whether during the employee's regular work schedule or otherwise, and will provide compensation for the time that the employee spends waiting for and being tested.

The School will not provide free COVID-19 testing to the following two (2) classes of employees: (1) Employees who were fully vaccinated before the close contact COVID-19 exposure and who do not have COVID-19 symptoms, and (2) COVID-19 cases who returned to work pursuant to the criteria set forth in Section K of this CPP and have remained free of COVID-19 symptoms, for 90 days after the initial onset

of COVID-19 symptoms or, for COVID-19 cases who never developed symptoms, for 90 days after the first positive test.

d. Leave and Compensation Benefits for Close Contact Exposures

The School provides employees who had a close contact COVID-19 exposure with information regarding COVID-19-related benefits to which the employees may be entitled under applicable federal, state, or local law, the School's own leave policies, and leave guaranteed by contract. These benefits include but are not limited to SPSL.

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

The School may require that these employees use School-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 conduct an investigation in order to determine whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what may be done to reduce exposure to COVID-19 hazards, if any.

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 identification and evaluation of 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 regular cleaning, as well as updates on minimizing high-risk activities such as travel and gatherings. Communication is provided to staff and faculty to update protocols as needed given changing guidance from the County or State.

1. COVID-19 Symptoms

The School provides employees training and instruction on 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 will advise employees in the event that the CDC revises the symptoms that it associates with COVID-19. 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. COVID-19 Vaccinations

The School provides employees information and instruction on the fact that COVID-19 vaccines are effective at both preventing the transmission of the virus that causes COVID-19 and preventing serious illness or death, and how employees may receive paid leave for reasons related to COVID-19 vaccinations. As discussed below, the School provides information on paid leaves to which employees may be entitled in order for them to be vaccinated and in the event that they experience any illness or adverse effects as a result of such vaccination.

3. School's COVID-19 Policies and Procedures

The School provides regular updates to employees on the School's policies and procedures adopted in order to prevent COVID-19 hazards at School worksites and facilities, how such policies and procedures are intended to protect the health and safety of employees and School worksites and facilities, and how employees may participate in the identification and evaluation of COVID-19 hazards in order to make such worksites and facilities healthier and safer for themselves and others.

4. COVID-19 Related Benefits

The School advises and provides updates to employees on the leaves to which employees may be entitled under applicable federal, state, or local laws as well as the School's own leave policies. Paid leave benefits include, but are not limited to, SPSL.

Further, when employees require leave in order to receive a COVID-19 test or to be vaccinated or are directed not to report to work by the School for reasons related to the presentation of COVID-19 symptoms, a COVID-19 case, close contact COVID-19 exposure, the School will advise the employees of the leaves to which the employees may be entitled for that specific reason.

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

The School advises and provides updates to employees about the known spread and transmission of COVID-19. The School specifically advises employees of the following: (1) that COVID-19 is an infectious respiratory disease; (2) that the virus that causes COVID-19 can be spread through the air when an infectious person talks or vocalizes, sneezes, coughs, or exhales; (3) 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; (4) that COVID-19 may be transmitted when a person touches a contaminated object and then touches his/her eyes, nose, or mouth, although that is less common; and (5) that an infectious person may present with no COVID-19 symptoms or be pre-symptomatic.

6. Hand Hygiene, Face Coverings, and Respirators

The School advises employees of the importance of physical distancing, face coverings, and hand hygiene, including handwashing, and instructs employees that the combination of physical distancing, face coverings, increased ventilation indoors, and respiratory protection make such preventative measures most effective.

With respect to hand hygiene, the School provides employees information regarding the importance of frequent handwashing, that hand washing is most effective when soap and water are used and the employee washes for at least 20 seconds. The School instructs employees to use hand sanitizer when employees do not have immediate access to a handwashing facility (i.e., a sink) and that hand sanitizer will not be effective if the employee's hands are soiled.

With respect to face coverings and respirators, the School provides employees information on the benefits of face coverings, both to themselves and to others. The School also provides employees information on the proper use of face coverings and the difference between face coverings and respirators.

The School will provide certain employees respirators for their use in certain circumstances, including to individuals who are not fully vaccinated, who are working indoors or in a vehicle with more than one person, and who request the devices for their use at work. At such time as the School provides respirators to employees for their use, it will provide such employees training on the proper use of such respirator, including, but not limited to, the method by which employees may check the seal of such respirator in conformance with the manufacturer's instructions.

The School will provide training on the conditions under which face coverings must be worn at the workplace and that face coverings are additionally recommended outdoors for people who are not fully vaccinated. Employees can request face coverings from the School at no cost to the employee and

can wear them at work, regardless of vaccination status, without fear of retaliation.

F. FACE COVERINGS

1. General Face Covering Requirements

All employees must wear face coverings while in indoor settings at School worksites and facilities regardless of vaccination status subject to the limited exceptions set forth below.

The School adheres to federal and state public health orders, mandates, laws, and regulations regarding face coverings, including those from the CDPH, Cal/OSHA, and the local health department, applicable to the School, and will provide face coverings to employees and enforce the wearing of face coverings by employees when so required.

The School requires that employees' face coverings be clean and undamaged. The School allows employees to use face shields to supplement, not supplant, face coverings.

2. Limited Exceptions

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

- a. When an employee is alone in a room (e.g., alone in an office or another space with walls that extend from the floor to the ceiling and a door that may be closed in order to close the space to others).
- b. While eating and drinking at the workplace and have an outside air supply to the area. If indoors, that airflow has been maximized to the extent possible.
- c. Employees wearing respirators required by the School and being used in compliance with the regulatory requirements for the use of such respirators.
- d. 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.
- e. 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.

3. Required Use of Effective Non-Restrictive Alternative for Employees Exempted from Face Covering Requirement

The School requires that its employees who are exempted from wearing face coverings due to a medical condition, mental health condition, or disability wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits it.

4. Physical Distancing Required If Employee Is Not Wearing Face Covering or Non-Restrictive Alternative

The School requires that any employees not wearing a face covering due to either exception number 4 or 5, identified in Subsection 2 “Training and Instruction of Employees” (p. 12), and not wearing a face shield with a drape or other effective alternative as described in Subsection 3 immediately above, shall remain at least six (6) feet apart from all other persons unless the unmasked employees are tested at least weekly for COVID-19 during paid time and at no cost to the employee or are fully vaccinated.

In situations where a face covering is otherwise required, face coverings must be worn, and the exceptions to face coverings contained in this section no longer apply.

However, the School does not use COVID-19 testing as an alternative to face coverings when face coverings are otherwise required by this section.

5. Prohibition on Preventing Employees from Wearing Face Covering

The School does not prevent any employee from wearing a face covering when wearing a face covering is not required by this section, unless wearing a face covering would create a safety hazard, such as interfering with the safe operation of equipment.

6. Communication to Non-Employees Regarding Face Covering Requirement

The School posts signage to inform non-employees of the School’s requirements concerning the use of face coverings at School worksites and facilities.

PROTECTIVE EQUIPMENT (PPE)

1. Maximization of Outdoor Air

As provided above in Section IV.B.5., for indoor School worksites and facilities, the School evaluated how to maximize the quantity of outdoor air.

Further, for School worksites and facilities with mechanical or natural ventilation, or both, the School maximizes the quantity of outside air provided to the extent feasible, except when the Environmental Protection Agency (“EPA”) Air Quality Index (“AQI”) 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, for instance from excessive heat or cold.

2. Cleaning Procedures

The School undertakes the following cleaning measures:

- a. Identify and regularly clean frequently touched surfaces and objects, such as doorknobs, equipment, tools, handrails, handles, controls, phone, headsets, bathroom surfaces;
- b. Inform employees and authorized employee representatives of the School’s cleaning and disinfection protocols, including the planned frequency and scope of cleaning and disinfection; and
- c. Clean areas, material, and equipment used by a COVID-19 case during the high-risk exposure period and disinfection of the area, material, or equipment is indoors and will be used by another employee within 24 hours of the COVID-19 case.

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

3. Evaluation of Handwashing Facilities

In order to protect employees, the School evaluates its handwashing facilities in order to determine the need for additional facilities, encourage and allow time for employee handwashing, and provide employees with an effective hand sanitizer. The School encourages employees to wash their hands with soap and water for at least 20 seconds each time. The School does not provide hand sanitizers with methyl alcohol.

4. Personal Protective Equipment (PPE)

a. Evaluation of the Need for PPE

The School evaluates the need for PPE in order to prevent

employees from being exposed to COVID-19 hazards.

b. Provision of PPE When Necessary

The School provides PPE, including, but not limited to, face coverings, respirators, gloves, goggles, and face shields, to and for employees who require such equipment in order to perform their job duties in a healthy and safe manner, including where employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

Upon request, the School shall provide respirators to employees for voluntary use to all employees who are not fully vaccinated and who are working indoors or in vehicles with more than one person. Whenever the School makes respirators available for voluntary use, the School will provide employees with a respirator of the correct size and will provide such employees training on the proper use of such respirators, including, but not limited, the method by which employees may check the seal of such respirator in conformance with the manufacturer's instructions, as discussed in Section IV.E.6.

5. Testing of Symptomatic Employees Who Are Not Fully Vaccinated

The School makes COVID-19 testing available at no cost to employees with COVID-19 symptoms who are not fully vaccinated. This testing will be made available during the employees' paid time.

H. REPORTING, RECORDKEEPING, AND ACCESS

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

The School reports COVID-19 cases and COVID-19 outbreaks at School worksites and facilities to the local health department. Further, the School provides any related information requested to the local health department.

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

The School maintains records of the steps it has taken to implement the provisions described in the CPP.

3. Availability of the CPP for Inspection

The School makes this written CPP available to employees and employee organizations at School worksites or facilities. Further, the School makes this

written CPP available to Cal/OSHA representatives immediately upon request.

4. Records Related to COVID-19 Cases

The School keeps a record of and tracks 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. The School keeps the employees' medical information confidential.

I. EXCLUSION OF COVID-19 CASES AND EMPLOYEES WHO HAD A CLOSE CONTACT COVID-19 EXPOSURE

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

The School ensures that COVID-19 cases are excluded from School worksites and facilities until the employee satisfies the minimum return to work criteria provided for in Section IV.J.

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

The School takes steps to exclude employees who had a close contact COVID-19 exposure from School worksites and facilities until the employee satisfies the minimum return to work criteria, as provided in Section IV.J.

The School may allow the following employees to continue to report to School worksites and facilities: (1) Employees who were fully vaccinated before the close contact COVID-19 exposure and who have not developed COVID-19 symptoms since such exposure; and (2) COVID-19 cases who returned to work pursuant to the return to work criteria, as provided in Section IV.J. and have remained free of COVID-19 symptoms for 90 days after the initial onset of COVID-19 symptoms, or, for COVID-19 cases who never developed COVID-19 symptoms, for 90 days after the first positive COVID-19 test.

3. Provision of Benefits to Employees 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 allows employees who are able 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. The School continues and maintains such an employee's earnings, wages, 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.

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

The following employees are not entitled to the benefits described below:

(1) Employees for whom the School can demonstrate that the close contact COVID-19 exposure was not work-related; and (2) Employees who received disability payments or were covered by workers' compensation and received temporary disability. Such employees may still use paid sick leave for the purpose of receiving compensation during the isolation or quarantine period if they elect to do so.

For other employees, Winston School requires that employees who are unable to telework but are otherwise able and available to work may use paid sick leave available to the employee, including but not limited to SPSL, for the purpose of continuing and maintaining the employee's earnings during the isolation or quarantine period. If the employee has exhausted their SPSL entitlement, the School may use the employee's paid sick leave in order to continue and maintain the employee's earnings during the isolation or quarantine period.

Employees retain their entitlement to elect not to use other earned or accrued paid leave during this time. The School may provide such employees who are unable to telework, but do not have any paid sick leave available, paid administrative leave in order to receive compensation during the isolation or quarantine period.

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.

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, School policy, or collective bargaining agreement that provides employees with greater protections or benefits.

5. Provision of Information Concerning Benefits to Excluded Employees

At the time of exclusion, the School provides the excluded employee the information on paid leave benefits to which the employee may be entitled under applicable federal, state, or local laws. This includes, but is not limited to, COVID-19 Supplemental Paid Sick Leave (“SPSL”) (under Labor Code section 248.2), any paid leave benefits available under workers’ compensation law, Labor Code sections 3212.86 through 3212.88, any applicable local requirements, the School’s own leave policies, and leave guaranteed by contract.

J. RETURN TO WORK CRITERIA

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

The School requires that a COVID-19 case with one or more 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: (1) At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications; (2) COVID-19 symptoms have improved; and (3) At least 10 days have passed since COVID-19 symptoms first appeared.

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

The School requires that COVID-19 cases who tested positive but never developed COVID-19 symptoms not report to any School worksite or facility 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 in Order to Return to Work

In accordance with CDC guidance concerning symptom-based strategies for the discontinuation of isolation, once an employee has satisfied the criteria to

return to work, as provided in this Section, the School will not require that the employee submit to a COVID-19 test or produce a negative COVID-19 test result, in order to return to School worksites or facilities.

4. Minimum Criteria to Return to Work for Close Contacts

a. **Asymptomatic Employees**

An employee who had a close contact COVID-19 exposure, but never developed COVID-19 symptoms may return to School worksites or facilities 10 days following the last known close contact COVID-19 exposure.

b. **Symptomatic Employees**

An employee who had a close contact COVID-19 exposure and developed one or more COVID-19 symptoms may not return to School worksites or facilities until they satisfy each of the following conditions: (1) At least 24 hours have passed since a fever of 100.4 degrees Fahrenheit or higher has resolved without the use of fever-reducing medications; (2) COVID-19 symptoms have improved; and (3) At least 10 days have passed since COVID-19 symptoms first appeared.

An employee who had a close contact COVID-19 exposure and developed one or more Covid-19 symptoms may return earlier if they satisfy each of the following conditions: (1) The employee tested negative for COVID-19 using a polymerase chain reaction (“PCR”) COVID-19 test with specimen taken after the onset of symptoms; (2) At least 10 days have passed since the last known close contact COVID-19 exposure; and (3) The employee has been symptom-free for at least 24 hours, without using fever-reducing medications.

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

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

If the relevant order did not specify a definite isolation or quarantine period, then the School will require that employees isolate or quarantine according to

the applicable periods and criteria provided for in this Section or as otherwise instructed by the School.