

Promise Schools COVID-19
Preparedness and Response Plan

In accordance with Executive Order 2020-97, Promise Schools institutes this COVID-19 Preparedness and Response Plan (“Plan”).

Promise Schools aims to protect its workforce by enacting all appropriate prevention efforts. Promise Schools is continually monitoring guidance from local, state, and federal health officials and implementing workplace and Plan modifications where appropriate.

Employees with questions are encouraged to contact Liz Ruiz at eruiz@promiseschools.org or Axios HR at 844-44-AXIOS.

Promise Schools designates the following worksite supervisors/employees to implement, monitor, and report on this Plan:

- Liz Ruiz
- Terry Kochis
- School Principals
- School Deans of Operations

Promise Schools will designate additional individuals as needed.

This Plan is maintained and posted at all Promise Schools campuses, the Promise Schools website, and each academy website.

1. Prevention Efforts and Workplace Controls

a. Cleanliness and Social Distancing

Promise Schools limits the number of employees present on premises and the movement of employees between work sites to no more than is strictly necessary. Employees who are able to perform their essential duties remotely may be permitted to work from home in accordance with approved telework arrangements.

Promise Schools abides by the recommended social distancing and other safety measures and establishes the following:

- Ensuring 6-foot distance between personnel, unless safety or core function of the work activity requires a shorter distance.
- Personnel must wear acceptable face coverings.

- Posting social distancing markers using tape or signs that denote 6 feet of spacing in commonly used and other applicable areas on the site (e.g. clock in/out stations, health screening stations).
- Limit in-person gatherings as much as possible and use tele- or video- conferencing whenever possible.
- Essential in-person gatherings (e.g. meetings) should be held in open, well-ventilated spaces with appropriate social distancing among participants.
- Employees are encouraged to maintain physical distance even when on break, as well as before and after working hours;
- Whenever possible, Promise Schools will utilize a flexible and/or rotational scheduling;
- Promise Schools utilizes physical barriers, where possible and appropriate;
- Promise Schools posts signage to emphasize the importance of personal hygiene;
- Employees' interactions with the visitors are modified to allow for social distancing and additional physical space between parties; and
- Non-essential travel are postponed or cancelled.

Promise Schools provides employees with, at a minimum, non-medical grade face coverings, as well as appropriate personal protective equipment ("PPE") (e.g., gloves, goggles, face shields, face masks) as appropriate. Masks must be worn by employees when in shared spaces (e.g., in-person meetings, restrooms, hallways) and if they consistently maintain fewer than six feet of separation.

In addition, Promise Schools is instituting the following cleanliness measures:

- Where possible, increasing ventilation rates and circulation throughout worksites;
- Implementing a cleanliness plan and infection-control measures in accordance with EPA Guidance for Cleaning and Disinfecting, performing routine environmental cleaning and disinfection with an EPA-approved disinfectant, especially of common areas and frequently touched surfaces;
 - Identifying what needs to be cleaned with soap and water, including visibly dirty surfaces;
 - Identifying what needs to be disinfected with an EPA-approved disinfectant or EPA-approved alternative, considering estimates that COVID-19 lasts in the air for 3 hours and on common surfaces for varying lengths of time (e.g., 5 days on glass; 4 days on wood; 3 days on plastic and stainless steel; and 24 hours on cardboard);
- Where available, providing hand-washing and/or hand-sanitizer in high-traffic areas to enable easy access by employees.

Promise Schools identifies the following locations as high-risk areas: hallways, elevators, staff lounges, and the cafeteria. Employees must maintain social distancing when occupying and/or passing through these areas.

Promise Schools provides employees with cleaning and disinfecting supplies. Please see your school's Dean of Operations for the appropriate supplies.

Employees are expected to minimize COVID-19 exposure by:

- Cleaning work stations and shared supplies every two hours as appropriate;
- Avoiding, when possible, the use of other employees' phones, desks, offices, or other work tools and equipment;
- Frequently washing hands with soap and water for at least 20 seconds;
- Utilizing hand sanitizer when soap and water are unavailable;
- Avoiding touching their faces with unwashed hands;
- Practicing respiratory etiquette, including covering coughs and sneezes;
- Immediately reporting unsafe or unsanitary conditions on Promise Schools premises to designated Plan supervisors and/or Human Resources;
- Complying with Promise Schools' daily screening processes;
- Seeking medical attention and/or following medical advice if experiencing COVID-19 symptoms;
- Complying with self-isolation or quarantine orders; and
- Utilizing personal protective equipment and hand sanitizer on public transportation.

Employees are trained on the information contained within this Plan. Employees must confirm by completing the training acknowledgment provided to all staff.

b. Supplemental Measures Upon Notification of Employee's COVID-19 Diagnosis and/or Symptoms

An employee with a COVID-19 diagnosis or who displays symptoms consistent with COVID-19 must be immediately removed from the worksite.

In response to a confirmed diagnosis or display of COVID-19 symptoms Promise Schools will work with the local health department to determine appropriate next steps including the following:

- Informing all employees, owners, contractors, or suppliers who may have come into contact with the diagnosed/symptomatic individual in the 48 hours preceding the onset of symptoms of a potential exposure;
- Keeps confidential the identity of the diagnosed/symptomatic individual; and
- Implementing its response plan and cleaning and disinfecting protocols, including shutting down appropriate areas of the premises, increasing ventilation, and conducting a deep cleaning of both the diagnosed/symptomatic individual's workstation and those common areas potentially infected by the individual as appropriate.

Promise Schools' Human Resources Department confidentially maintains a central log of diagnosed/symptomatic employees. If applicable, Promise Schools notifies Promise Schools leadership, contractors or owners of confirmed COVID-19 diagnoses among workers on premises.

Within 24 hours of a confirmed COVID-19 diagnosis, Promise Schools notifies the local public health department.

Promise Schools' Human Resources maintains documentation related to exposure notifications.

Promise Schools completes an OSHA Form 300, as well as a Form 301, "if it is more likely than not that a factor or exposure in the workplace caused or contributed to the illness." If an employee infects a coworker, the coworker has suffered a work-related illness if one of the recording criteria (e.g., medical treatment or days away from work) is met.

c. Worker Exposure Classification

Employees' "worker exposure" is classified as lower risk by the Occupational Safety and Health Administration's guidance because they do not frequently and/or closely interact with the general public, and social distancing can be maintained between coworkers.

Given this classification, no additional controls are recommended or required by OSHA at this time.

2. Identification and Isolation of Sick and/or Exposed Employees

Risk and exposure determinations are made without regard to employees' protected characteristics, as defined by local, state, and federal law.

Any health-related information and documentation gathered from employees is maintained confidentially and in compliance with state and federal law. Specifically, medical documentation is stored separate from employees' personnel documentation.

a. Employees' Self-Monitoring

The following employees should **not** report to work and, upon timely notification to their supervisor and Human Resources, will be removed from the regular work schedule:

- Employees who are currently and atypically suffering from symptoms of COVID-19, such as fever of 100.4 degrees or greater, chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, sore throat, new loss of smell or taste, congestion or runny nose, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting, whether or not accompanied by a formal COVID-19 diagnosis;
- Employees who, in the last 14 days, have had close contact with and/or live with any person having a confirmed COVID-19 diagnosis; and
- Employees who, in the last 14 days, have had close contact with and/or live with any person who is atypically suffering from symptoms of COVID-19, such as fever of 100.4 degrees or greater, chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, sore throat, new loss of smell or taste, congestion or runny nose, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting.

Such employees may only resume in-person work upon meeting all return-to-work requirements, defined below.

b. Daily Screenings

To prevent the spread of COVID-19 and reduce the potential risk of exposure, Promise Schools screens employees and visitors on a daily basis at dedicated entry points; Promise Schools ensures that employees and visitors utilize these entry points by barring entry via other egresses.

Employees are asked the following questions before entering the worksite:

1. Are you currently and atypically suffering from any of the following symptoms – fever of 100.4 degrees or greater, chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, sore throat, new loss of smell or taste, congestion or runny nose, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting?
 - a. Once a touchless thermometer is available, temperature checks are performed.
 - b. If yes, access is denied, and employee is advised to self-isolate/self-quarantine at home, until employee is permitted to return to work as defined below.
2. Have you lived with, or had close contact with, someone in the last 14 days diagnosed with or displaying the symptoms of COVID-19?
 - a. If yes, access is denied, and employee is advised to self-isolate/self-quarantine at home, until at least 14 days after the close contact.
3. Have you travelled in the last 14 days?
 - a. If yes, access is denied, and employee is advised to self-isolate/self-quarantine at home, until at least 14 days after the return from travel.

Visitors who reply “Yes” to any of the above questions are not permitted entrance.

Employees who develop symptoms during their shift must immediately report to their supervisor and/or Human Resources.

Promise Schools’ Human Resources maintains documentation related to daily screenings.

c. Return-to-Work Requirements

Employees who were themselves diagnosed with COVID-19, or experienced symptoms thereof, as defined by the Daily Screening process, may only return to work upon confirmation of the cessation of symptoms and contagiousness, proof of which may be acquired via the test-based strategy or the symptom-based strategy.

Under the testing-based strategy, Employees may discontinue isolation and return to work upon achieving the following conditions:

The test-based strategy is preferred but relies upon the availability of testing supplies and laboratory capacity. Under this strategy, employees may discontinue isolation and return to work upon achieving the following conditions:

- Resolution of fever without the use of fever-reducing medications;
- Improvement in respiratory symptoms (e.g., cough, shortness of breath); **and**
- Two consecutive negative results from COVID-19 tests conducted at least 24 hours apart and in accordance with the current FDA/CDC-recommended procedure.

Under the symptom-based strategy, employees may discontinue isolation and return to work upon achieving the following conditions:

- At least 3 days (72 hours) have passed since recovery defined as resolution of fever without the use of fever-reducing medications;
- Improvement in respiratory symptoms (e.g., cough, shortness of breath); and
- At least 10 days have passed since symptoms first appeared.

Employees who came into close contact with, or live with, an individual with a confirmed diagnosis or symptoms may return to work after either 14 days have passed since the last close contact with the diagnosed/symptomatic individual, or the diagnosed/symptomatic individual receives a negative COVID-19 test.

Employees are typically required to submit a release to return to work from a healthcare provider; given the current stressors on the healthcare system, Promise Schools may accept written statements from employees confirming all the factors supporting their release.

3. Workplace Flexibilities and Potential Benefits for Employees Affected by COVID-19

Employees may be eligible for paid and unpaid leaves of absence. Employees may be permitted to utilize available paid-time off provided under Promise Schools policy concurrently with or to supplement any approved leave.

a. FFCRA

Employees may qualify for two different types of paid leave under the Families First Coronavirus Response Act (“FFCRA”).

Under the Emergency Paid Sick Leave Act (“EPSLA”), employees may seek up to two weeks (i.e., 10 business days) of paid leave for the following reasons:

1. Subject to a Federal, State, or local quarantine or isolation order related to COVID-19;
2. Advised to self-quarantine due to concerns related to COVID-19;
3. Experiencing symptoms of COVID-19 and seeking a medical diagnosis;
4. Caring for an individual subject to a quarantine or isolation order or advised to self-quarantine due to concerns related to COVID-19;

5. Caring for a son or daughter whose school or childcare provider is closed or unavailable due to COVID-19 precautions; and
6. Experiencing any other substantially similar condition specified by the Secretary of Health and Human Services, in consultation with the Secretary of the Treasury and the Secretary of Labor. (Please note, the Secretary of Health and Human Services has not defined conditions which trigger this subpart under the EPSLA.)

For full-time employees, two weeks of leave equates to 80 hours; for part-time employees, two weeks of leave equates to a number of hours equivalent to the number of hours usually worked in a two-week period.

Paid leave for reasons 1, 2, and 3, above, is paid at the employee's regular rate of pay, capped at \$511/day. Paid leave for reasons 4, 5, and 6, above, is paid at a rate equivalent to two-thirds of an employee's regular rate of pay or minimum wage, whichever is greater, capped at \$200/day.

Under the Emergency Family and Medical Leave Expansion Act, employees may seek up to twelve weeks of leave to care for a son or daughter whose school or childcare provider is closed or unavailable due to COVID-19 precautions. The first two weeks of leave, which run concurrently with the EPSLA leave, may be unpaid; the remaining ten weeks of leave are paid at a rate equivalent to two-thirds of an employee's regular rate of pay or minimum wage, whichever is greater, capped at \$200/day.

b. Executive Order 2020-36

Employees who require leave beyond the EPSLA because of their own COVID-19 diagnosis/symptoms, or because they have had close contact or live with an individual with a COVID-19 diagnosis/symptoms, may be eligible for unpaid leave under Executive Order 2020-36 until permitted thereunder to return to work.

c. Unemployment Compensation Benefits

Under Executive Order 2020-76, and the federal CARES Act, unemployment compensation benefits are expanded in terms of eligibility, amount, and duration.

Employees who are unable to report to work for reasons related to COVID-19 are referred to Human Resources for information on unemployment compensation benefits. Such reasons include the following:

1. Being under self-isolation or self-quarantine in response to elevated risk from COVID-19 due to being immunocompromised;
2. Displaying at least one of the principal symptoms of COVID-19 (i.e., fever, atypical cough, atypical shortness of breath);
3. Having close contact in the last 14 days with a confirmed COVID-19 diagnosis;
4. Needing to care for someone with a confirmed COVID-19 diagnosis; and

5. Fulfilling a family care responsibility as a result of a government directive (e.g., caring for a child whose school or childcare provider is closed or otherwise unavailable due to COVID-19).

d. FMLA and ADA

Employees may be entitled to unpaid leave under the Family and Medical Leave Act (“FMLA”) if their absence is related to their own serious health condition or that of a family member. COVID-19 may constitute a serious health condition where “complications arise.”

Promise Schools is also mindful of its obligations under the Americans with Disabilities Act (“ADA”). Specifically, if an employee requests an accommodation because of a condition that may be complicated by COVID-19 (e.g., cystic fibrosis, emphysema, COPD), then Promise Schools engages in the interactive process to provide a reasonable accommodation. This may mean allowing the employee to work remotely (if reasonable) or work an alternative schedule.

4. Recordkeeping

Promise Schools will maintain the following records as they relate to the COVID-19 preparedness and response plan:

- Cleaning and disinfection records.
- A record of daily entry self-screening results for all employees or contractors entering the workplace, including a questionnaire covering signs and symptoms of COVID-19 and exposure to people with suspected or confirmed COVID-19.
- When an employee is identified with a confirmed case of COVID-19, a record that within 24 hours the local public health department was notified as well as any co-workers, contractors, or suppliers who may have come into contact with the person who was the confirmed case of COVID-19.

The School Principals will ensure that the records are kept.

5. Plan Updates and Expiration

This Plan responds to the COVID-19 outbreak. As this pandemic progresses, Promise Schools will update this Plan and its corresponding processes.

This Plan will expire upon conclusion of its need, as determined by Promise Schools and in accordance with guidance from local, state, and federal health officials.