Health & Safety Plan

Campus Guidance for COVID-19

Pandemic Preparedness & Response

Developed by:
Ross Education, LLC

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INTRODUCTION

In response to the recent COVID-19 pandemic, Ross Education, LLC has assembled a preparedness and response document developed as "roadmap" to raise awareness of new health and wellness protocols and practices in our campuses. This "roadmap" includes practical recommendations, existing protocols for health and safety, and guidelines from the Center of Disease Control and Prevention. The document contains the following:

- Guidance for setting up a pandemic response team
- Protocols for steps to post virus exposure
- Recommendations for self-assessment for symptoms
- Preventative protocols to help ensure the health and safety for students and staff
- Guidance for Social Distancing
- Cleaning and disinfection procedures

CAMPUS OPERATION PROTOCOLS

Pandemic Response Team

Ross Education, LLC's will assemble a Pandemic Response Team (PRT) that will be comprised of the following staff members and will report to Executive Management.

- Senior Vice President of Operations
- Executive Vice President of Career Services
- Human Resources
- Director of Education
- Director of Facilities
- Chief Administrative Officer

The Pandemic Response Team will be responsible for coordinating the following activities:

- Operational continuity for optimum student experience
- Implementation of preventative protocols for standardization for all campuses
  - ➢ Execute the Ross Campus Guidance for COVID-19 Pandemic Preparedness & Response
  - ➢ Communicate healthy hygiene & cleaning disinfection practices
  - ➢ Monitor absenteeism for variances for the norm
- Coordination of preparation for a campus exposure
  - ➢ Maintain contact information for the local Health Department so it can be contacted within 24 hours from notification of a positive COVID-19 case
  - ➢ Maintain contact information for local emergency services
- Efforts for the re-opening of a campus post exposure with the local Health Department
- Cleaning and disinfection efforts
- Coordination of social distancing practices at offices and campuses so that everyone is at least 6 feet from one another to the maximum extent possible, and to reduce congestion, including using ground markings, signs, and physical barriers as appropriate to the worksite.
- Categorizing job tasks and procedures into the State of Michigan risk categories and reviewing as needed. As of 11/12/20, the two risk categories of our employees and students are "Lower exposure risk" and "Medium exposure risk". This Health and Safety Plan addresses the safety needs of both categories.

At each Ross location, we designate one more COVID-19 safety coordinators to implement, monitor and report on the COVID-19 control strategies and COVID-19 incidents. The designated safety coordinators will be the Associate Director and/or Full Time Instructor, and Educational Support Coordinator.

Signs & Symptoms, Self-Screening Away from Campus

Staff & students should be aware of the latest signs and symptoms of the COVID-19 virus as identified by the Center for Disease Control & Prevention. Virus carriers can be symptomatic or asymptomatic, so use the guidelines listed below to mitigate exposure.

People with COVID-19 have had a wide range of symptoms reported*, ranging from mild symptoms to severe illness. Symptoms may appear 2-14 days after exposure to the virus. People with these symptoms or combinations of symptoms may have COVID-19:

- Cough
- Shortness of breath or difficulty breathing

Or at least two of these symptoms:

- Fever
- Chills
- Repeated shaking with chills
- Muscle pain
- Headache
- Sore throat
- New loss of taste or smell

EMERGENCY WARNING SIGNS/PROCEDURES
Individuals with any of the emergency warning signs for COVID-19 should seek immediate medical attention*

- *Trouble breathing*
- *Persistent pain or pressure in the chest*
- *New confusion or inability to arouse*
- *Bluish lips or face*
- *Lesions on feet*

*List is not all inclusive. Individuals should seek medical attention for any symptoms that are severe or concerning.

Call 911 for any medical emergency. Notify the operator that the individual has/may have, COVID-19. If possible, isolate the individual and make sure their cloth face covering, and your own face covering are in place

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Individuals experiencing symptoms (non-emergency) or think they might have Covid-19 should:

- Remain/Return home
- Contact a medical professional
- Contact Associate Director via phone to inform them and identify areas on campus that were recently accessed (if applicable) and any individuals that were in close contact (per following definition)
- Follow Medical Provider's instructions re: self-monitoring, quarantine, testing, etc.
- Return to work/campus based on CDC recommendation
    - **Must** be at least 5 days starting from 1st full day after symptoms developed.
    - **Must** have improvement in symptoms
    - **Must** be 24 hours with no fever without fever-reducing medication
    - **STUDENTS:** may provide negative test results or medical clearance, but it is not required to return provided the above criteria is met.
    - **STAFF***: must follow the normal LOA process which requires medical clearance to return. Contact Human Resources for assistance in determining what is needed.

NOTE*: An individual experiencing symptoms similar to COVID-19 that have been determined by a medical professional to be expressly unrelated to COVID-19, must follow the guidance above. The recommended timeframe for quarantine and return to work/school could be less than depending on the nature of the illness, but would need to be supported by documentation from a medical professional*

Individuals who have had [close contact](#) (*as defined below*) with someone with COVID-19 should;

DEFINITION OF CLOSE CONTACT
- ✓ *Within less than 6 feet of an infected person (laboratory-confirmed or clinical diagnosis) for a cumulative total of 15 minutes or more over a 24-hour period (ex: three individual 5-minute exposures for a total of 15 mins.)*
- ✓ *Reside with and/or care for someone who has COVID-19*
- ✓ *Direct physical contact with someone that had COVID-19, outside of the course of work in a healthcare facility wearing proper PPE and following required protocols.*

- Remain home
- Contact a medical professional
- Follow guidance from medical provider, CDC, and local state regulations for self-isolation, quarantine, testing, etc. (can vary by state)
- CDC recommendation;
    - **If no symptoms and fully vaccinated w/in the last 6 mths. (2 mths. for J&J) and boosted** – quarantine is not required. A mask should be worn around others for 10 days. Test on day 5 if possible, and self-monitor for symptoms.
    - **If no symptoms and fully vaccinated more than 6 mths. ago (over 2 mths. for J&J) and not boosted, or are unvaccinated** – quarantine for a minimum of 5 days and continue to wear a mask around others for 5 additional days. Test on day 5 if possible and self-monitor for symptoms. If a mask can't be worn, quarantine for 10 days
    - **If recovered from a confirmed case of COVID**-19 within the last 90 days, quarantine is not required.
    - **If symptoms are present or develop** - get tested and isolate until results are received. Then follow appropriate guidelines.
        - ➢ **If Positive:** isolate for a minimum of 5 days from the 1ˢᵗ full day after symptoms develop. End isolation after 5 full days if symptoms have resolved and fever-free for 24 hours w/o use of fever-reducing medication.
        - ➢ **If Negative:** wear a mask around others for 10 days after close contact occurred. If unable to wear a mask, then quarantine for 10 days.
- *Note: quarantine requirements may vary by state*
- ADs/RCDs will need to attest to viewing the vaccination record to verify and note the date of last dose on the Incident Report submitted.

STUDENTS
- Must contact Associate Director via phone to inform them and identify areas on campus that were recently accessed (if applicable) and any individuals that were in close contact (per provided definition)
- May return to campus after the completion of required quarantine period, provided they are not experiencing symptoms that will prevent them from completing the required Campus Entrance Process. Negative test results or medical clearance may be provided, but are not required.

STAFF
- Should contact their Supervisor via phone to inform them and review areas recently accessed at work and any individuals that were in close contact (per provided definition)

- Follow the normal LOA process. Supervisor and/or staff should contact Human Resources for assistance in determining what is needed.
- May return to work after the completion of required quarantine period, provided they are not experiencing symptoms that will prevent them from completing the required Campus Entrance Process. Contact Human Resources regarding what will be needed to close the LOA.

Individuals who test positive for COVID-19 should do the following:
- Remain home
- Contact a medical professional
- Self-isolate
- Follow guidance from medical provider, CDC and local state regulations for self-isolation requirements (can vary by state)
- CDC recommends:
  - **If symptoms are present:** isolate until symptoms resolve. CDC recommends a minimum of 5 days starting from the 1st full day after symptoms develop and at least 24 hrs. w/o fever and use of fever-reducing medication. Continue to wear a mask around others for an additional 5 days. If unable to wear a mask, then isolate for 10 full days.
    - CDC recommends an isolation period of 10-20 days for people who were severely ill or hospitalized with COVID-19, or have weakened immune systems.
  - **If there are no symptoms (asymptomatic):** isolate for a minimum of 5 days from the 1st full day after positive test results, followed by 5 days of wearing a mask around others and self-monitor for symptoms. If unable to wear a mask, then isolate for 10 full days.
  - *Note: Healthcare provider may recommend a longer quarantine period based on symptoms, severity or other health considerations.*

STUDENTS
- Must contact the Associate Director via phone to inform them and identify areas on campus that were recently accessed (if applicable) and any individuals that were in close contact (per following definition)
- May return to campus after the completion of required quarantine period, provided they are not experiencing symptoms that will prevent them from completing the required Campus Entrance Process. Negative test results or medical clearance may be provided, but are not required.
  - If symptoms are present, follow the guidelines for *"individuals experiencing symptoms"*

STAFF
- Should contact the Associate Director via phone to inform them and review areas recently accessed at work and any individuals that were in close contact (per provided definition)
- Follow the normal LOA process. Supervisor and/or staff should contact Human Resources for assistance in determining what is needed.
- May return to work after the completion of required quarantine period, provided they are not experiencing symptoms that will prevent them from completing the required Campus Entrance Process. Contact Human Resources regarding what will be needed to close the LOA

* FREE COVID-19 TESTING
Beginning January 19, 2022, the government will start taking orders for free at-home COVID-19 tests. Up to 4 free tests can be ordered. The tests are to be completely free and without shipping costs. https://www.covidtests.gov/

Covid-19 Response Process

Action Steps to respond to a student or employee who has failed the entrance process, communicated with the campus about symptoms, exposure, treatment or testing, and/or a confirmed positive COVID-19 test.

- **Pull required documents from the Operations Folder**

- **Complete the Incident Report for Infectious Disease.** Complete with all required information and save the file with campus name, date, and individual's last name, first initial (*eg: Brighton 11.17.20 Smith, A*).

- **Notify PRT via email using the Incident Report and send to prt@rosseducation.edu**. The Associate Director or Regional Campus Director should include as much detail as possible on the report, completing all fields. (campus, name of sick exposed student/staff, when/where exposure took place, last date on campus, areas accessed, individuals in close contact (w/in 6 feet), etc.). Include any direction provided by the local health department. If you are an Associate Director emailing the PRT, please CC your RCD.

- **PRT Notification triggers the following activities:**
  - Human Resources will add the incident to the COVID Tracker
  - RCD contacts local health department for guidance on staff/student notification and possible campus closure (see information at the end of this section about what information to get from a Health Department call). RCD will also complete any contract tracing forms as required by the Health Department. In the state of Indiana, the health department will take the information over the phone.
  - RCD & Associate Director coordinate on results with Vice President of Operations
  - VP or RCD sends update/updated incident report to PRT email including direction from health department and information on how students/staff will be notified of potential exposure.
    - Notify staff/students according to guidance received **see Item 8 below.
    - Maintain confidentiality as required by the Americans with Disabilities Act.
  - Human Resources provides support to employee and Associate Director or Supervisor on next steps regarding time off, LOA or any other resources and requirements
  - Director of Education should be contacted directly if academic adjustments need to be considered for the student to meet programmatic requirements.
  - Director of Education replies to PRT on status of programs when consideration is complete.
  - Director of Facilities arranges for Deep Cleaning and Disinfecting with janitorial vendor/s and updates tracker upon completion, along with any notes.
  - Human Resources will make sure the report is saved on the Google Drive along with related documents

- **Notify PRT of any additional information or updates as applicable**

- **Provide PRT with update on any staff/students identified as exposed during the incident (if applicable)**. Complete separate incident report for those staff/students that test positive

- **Notification to students and staff of a positive result should be done by email using the following text. The RCD should edit the text as needed with state and location and submit to Ryan Middleton for review. Once approved, he will forward to Steve Redmond or Dave Fowler for distribution to all active students at campus, and to HR for distribution to all staff. Note: Within 24 hours of learning of the known case, using this process, students, employees, contractors or suppliers who may have come into with the person with a known case of COVID-19.**

POSITIVE COVID-19 NOTIFICATION

Ross Medical Education Center or Ross College – [*city, state*] received notification on [*insert date*] that a member of our campus community tested positive for COVID-19. The individual was last on campus on [*insert date*].

Contact Tracing has been carried out per the guidelines established by the [*insert state*] Department of Health, and anyone that would have been in close contact with this individual (within six feet for 15 minutes) may have been notified directly.

*(Use **one** of the next three paragraphs):*

➢ In guidance from the [*insert health department name, such as Eaton County Public Health Department*], it was determined that no one on campus was in close contact with the individual within 48 hours of symptoms developing and therefore it was not necessary to notify anyone directly.

➢ [*insert health department name, such as Eaton County Public Health Department*] will follow up with any staff or students they believe were in close contact with the individual within 48 hours of symptoms developing.

➢ [*insert health department name, such as Eaton County Public Health Department*] has asked us to notify you that you were in close contact with the individual within 48 hours of symptoms developing. Close contact is defined as being within less than 6' of the affected individual for 15 minutes or more. You may follow up with them for more information.

All of us at Ross Education Medical Education Center continue to work diligently to provide a safe learning environment for all students, faculty and staff during this challenging time. Please remember to wear a mask (in and out of school), wash and/or sanitize your hands frequently, social distance (in and out of school) and be forthcoming with campus leaders if you are feeling any symptoms related to COVID-19.

If you have any further questions please contact [insert Associate Director or Regional Campus Director name and title, email address and phone number].

- **"Close out" the incident and approve the individual to return to campus/work by providing the required documentation below;**

  STUDENTS: Submit **one** of the following to the PRT to approve the student to return to campus;

- *"Student Incident Closure Form"* indicating that the required criteria to return to campus have been met.
- Negative test results: are not required, but can be provided to approve return if all other required criteria have been met.
- Medical clearance: is not required, but can be provided to approve return if all other required criteria has been met.

  STAFF: Must provide required documentation to return to work. Contact Human Resources regarding what is needed. Staff should not return to work without HR approval. An email should be sent to the PRT as notification that the employee has returned and the incident can be closed.

How to handle a call to the local Health Department

➢ Have your incident report in front of you.

➢ Get the name and number of the person you are talking to.

➢ Be sure you are clear on who you think was in close contact during the incident using the definition on page 3; within 6 feet of infected individual for a cumulative total of 15 minutes or more per day, starting 2 days prior to the onset of illness or positive test results.

➢ Make sure to get the following questions answered:

- Who does the health department deem as close contact?

- We will notify the entire campus of a positive incident on campus, but who will the health department contact? Close contacts? Only person infected?

- What do they expect the timeline would be for those health department calls? What do they expect as a timeline for us to do notification?

- Who should quarantine and why? How does the health department notify people of quarantine? Do they send a letter for the end of quarantine that can be used as a "return to work" or "return to school" note?

- Again, will the people who have to quarantine be notified by the health department?

Preventative Protocols to Minimize Exposure

Preventative measures will be implemented to minimize the potential for spread and exposure on the campus

Limited Reopening *Discontinued*	Campuses will reopen initially on a limited basis for labs/clinical and student tutoring only. Campus capacity will be managed in accordance with local regulations and requirements. Hybrid learning opportunities have been put in place to allow students remote options that require less time on campus.
Social Distancing *Reinstated 12.9.21*	Classrooms will be configured to maintain distance between individuals. Social distancing should be practiced at all times on campus. Individual interaction/close contact should be avoided to the extent possible. Proficiency observation requiring close contact must be performed with required PPE. Follow recommended social distancing practices: https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/social-distancing.html
Admissions	A remote/online admissions process was implemented for students to eliminate the need for in person appointments. *Note: students requesting an in person admissions appointment on campus can be accommodated provided the student is made aware of the Health & Safety Protocol Requirements as noted in the Health & Safety Plan and know they must complete the required Campus Entrance Process (Refer to Campus Entrance Process Instructions).*

Student Communication
 	
Discontinued
	Students will be informed of campus protocols and what is required/prohibited prior to coming to campus
	    ○ Required PPE/Masks
	    ○ No acquaintances/children permitted on campus
	    ○ Limiting personal items on campus
	    ○ Closure of breakroom area

Campus Signage	Posted notices, for reception, classroom, restrooms etc. including CDC guidelines on distancing, handwashing, sanitizing, etc. *Documents stored along with this one in the Operations Folder.*
Controlled entrance to campus *Discontinued*	Individuals will be permitted to enter one at a time subject to required screening below. Placement markings will be positioned outside of the building to maintain required social distance.

Temperature/Screening Checkpoint
 	
Discontinued
	Health Screening/temperatures checks will be completed by all staff and students entering the campus. Individuals with a symptoms/exposure or temperature of 100.4 degrees, will be denied entrance to campus and advised to:
	    ○ Return home
	    ○ Contact a medical professional

	○ Follow up with Campus via phone *Refer to the Campus Entrance Process Instructions*
Restrict personal belongings allowed on campus *Discontinued*	Only items required to perform proficiencies will be allowed on campus. Personal items (phone/keys/wallets) should be bagged and not laid on counters or desks. *Ross will provide Ziploc bags as needed.*
Personal Protective Equipment (PPE)	==**Masks:** All employees & students will be required to wear a mask upon arrival and <u>at all times</u> while on campus or Ross offices (including staff meetings). Individuals should plan to utilize their own personal masks and will be responsible for storing/keeping masks clean for reuse (brown paper bags can be provided). Ross will have masks available for those that do not have/or do not have appropriate masks.== **Gloves**: will not be required for general presence on campus but will be required for all clinical procedures and be disposed of afterward as appropriate. **Gowns and Face shields:** will be distributed and utilized for clinical procedures as appropriate and will be discarded/sanitized as appropriate.
Classroom Configuration *Reinstated 12.9.21*	Set up to maintain distance between students and instructor. Limit use of shared equipment/supplies as much as possible, clean equipment/supplies between use. Social distancing should be practiced in the classroom limiting interaction/close contact between individuals, including instructors.
Closure of student Lounge & Drinking Fountain *Discontinued*	Student lounge area will be closed. Chairs will be stacked and closure sign will be posted. Drinking Fountain will be closed.
Enhanced Cleaning Protocols – Staff/Student workspace	Perform sanitizing with EPA approved sanitizer, following the "Guidelines for Universal Precautions" standard Ross document on the Operations Site. Follow the American Society of Heating, Refrigerating and Air-Conditioning Engineers guidelines: Click Here for Guidelines Ensure that Janitorial service follows the "Enhanced Cleaning Work Instructions for Education Environments" document at the end of the document.
Eliminate sharing of office tools and workspace	Ross Education prohibits employees from using other employees' phones, desks, offices or other work tools and equipment, when possible.
Lobby Use *Discontinued*	Limit the waiting-area occupancy to the number of individuals who can be present while staying 6 feet away from one another. Discard magazines in waiting areas and other non-essential, shared items that cannot be disinfected.

Social Distancing Protocol

Social distancing is a simple, yet very effective, mechanism to prevent potential infection. Social distancing should be practiced on campus to the fullest extent possible.

Click Here to read the CDC Guidelines

In practice this means:

- Practice safe social space where possible and avoid group gatherings
- Eliminating contact with others, such as handshakes or embracing coworkers, visitors, or friends
- Avoiding touching surfaces touched by others, to the extent feasible
- Avoiding anyone who appears to be sick, or who is coughing or sneezing
- In certain situations, proficiencies may be performed where social distancing may be difficult. In those situations, students and staff should wear required PPE to minimize the potential for virus transmission.
- Social gatherings on campus, or potluck events with shared food items are strictly prohibited at this time.

Disinfection Measures

Our janitorial services will follow CDC guidelines for sanitizing education environments: Click Here to review.

Students and staff are required to adhere to the "Guidelines for Universal Precautions" standard Ross document on the Operations Site.

Deep Cleaning & Disinfection Protocol

In the event that a student or staff person has been diagnosed as testing positive for COVD-19, the PRT should immediately begin the process of a deep cleaning & disinfection. The Director of Facilities will contact our janitorial service to coordinate the execution of the cleaning.

The campus must be closed with no occupants to complete the cleaning. The janitorial service will complete the service based on CDC guidelines for cleaning, using EPA approved disinfectants.

Services can take anywhere from 24-48 hours to complete, depending on the extent of exposure in the campus and product utilized. ***Between and after disinfecting all facilities, used products and equipment should be disinfected and all used PPE should be immediately thrown away.**

Campus will be ready for operation after Janitorial Service provides an "All Clear" and the building has been approved for occupancy by the local Health Department.

Operation in campus may resume thereafter

Facility Signage

Several signs have been made available for use throughout the campus and are in the Operations Folder with access for Associate Directors and other leadership. ALL signs should be printed in color and posted in the campus. If you do not have a color printer, please request copies from the PRT.

Some of the signs are for bathrooms – they should be posted on the door leading into the bathroom, so there is no question that you see the sign as you enter.

Some signs are for reception area, both for coming and going.

Some signs are for the classroom.

Too many signs are better than too few signs. Use common sense, protect our staff and students.

If you are unsure about what sign to use where, please contact Chileshe Mulenga, cmulenga@rosseducation.edu, 810-956-4669.

Employee Training

Employee training will be provided to all Ross employees that will address the following COVID-19 areas:

- Workplace infection-control practices
- The proper use of personal protective equipment
- Steps employees must take to notify their supervisor in the event that they present or suspect symptoms of COVID-19.

The training will also cover steps required to report unsafe working conditions as outlined in the "Employee Handbook."

The training will be presented in a webinar format and is required for all employees.

Additional leadership training will be provided from time to time and logged at the Corporate Office, Clinton Twp., MI.

Employer Records

Ross Education, LLC will maintain a record of all incidents reported in our facilities as required by State Health and Safety agencies for auditing and transparency. This log is kept at the Corporate Office in Clinton Twp., MI.

Work from Home Policy

Ross Education, LLC reviews work environments and job duties to take advantage of any opportunity for employees to work from home. As Ross is in the business of serving students face-to-face and, has many student, employee and vendor activities which have to be completed at the campus or at a Ross office, working from home is not feasible for many roles. Several steps have already been taken to reduce total headcount at each location, move campus staff to remote teams, and increase technology to be able to supply remote options for students and staff to complete administrative tasks related to attending school.

If an employee is to work from home, the following conditions must be met:

- The role must be Exempt FLSA status, or if hourly, have an appropriate supervision process in place;
- The role must not include face to face student services or instruction;
- The role must not rely on specific technology only available at offices - scanning, mail metering, UPS pick-up & delivery, copying, vendor deliveries, centralized call distribution, centralized call system, local network services;
- The employee will need to have a quiet space in their home where they can work without interruption and background noise. All Ross jobs require work on the telephone, so the environment needs to be appropriate for that work;
- The employee needs to have reliable and high speed internet access for both data and phone;
- As of November 12, 2020, Ross will not supply new work from home equipment, so you will need to have your own reliable monitor, headset and CPU. Because Ross uses a VOIP phone system,

you will not need a separate phone; exception will be made if a person is hired to a job designated as work from home at the time of hire.

- If "wet signature" documents are an aspect of the employee's work, they need to have printer and scanner to be able to complete those documents;

Currently, the following campus roles, by definition, cannot be worked from home: Associate Director, Education Support Coordinator, Full Time Instructor, Primary Instructor, Secondary Instructor, Regional Campus Director, and Call Center Representative. This list is not complete for the corporation and can be modified at any time by Ross Education, LLC.

If an employee believes their work can be considered for work from home, and has been an employee for six months or longer, please bring it to the attention of your immediate supervisor for review against the conditions stated above.   After reviewing the conditions together, any request for work from home should be sent to Anthony Iaquinto, Chief Administrative Officer, email: tiaquinto@rosseducation.edu or 810-740-1007.

Work from home situations that are short term or emergency are not addressed by this policy and will be reviewed on a case by case basis through the Leave of Absence process, or other time off requests.