

Health & Safety Plan

Campus Guidance for Control of COVID-19

and other Communicable Diseases

Developed by: Ross Education Holdings, Inc.

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INTRODUCTION

In response to the recent COVID-19 pandemic, Ross Education Holdings, Inc. assembled a preparedness and response document developed as a "roadmap" to raise awareness of new health and wellness protocols and practices in our campuses. The plan was updated regularly as the Center of Disease Control and Prevention guidance evolved. The Federal Government ended the Public Health Emergency related to COVID on May 11, 2023, however, protocols for prevention, transmission and treatment remain in place. The Ross Health & Safety Plan has been revised to include guidance on other communicable diseases in addition to COVID-19.

Ross Education Holdings, Inc. recognizes its responsibility to protect the health of students and employees from the risks posed by infectious diseases while at the same time upholding the rights of affected individuals to privacy and confidentiality, to attend school and to be treated in a nondiscriminatory manner. Therefore, the associate director will obtain appropriate medical direction from their manager or Human Resources, when necessary, to ensure that an employee's or student's condition does not pose a significant risk of substantial harm to him/herself or to other employees or students

The Health & Safety Plan includes the following:

- Recommendations for self-assessment of symptoms and illness
- Protocols for COVID-10 exposure or illness
- Protocols for other communicable diseases or infections
- Preventative protocols to help ensure the health and safety of students and staff
- Cleaning and disinfection procedures

CAMPUS OPERATION PROTOCOLS

Pandemic Response Team

Ross Education Holdings, Inc.'s Pandemic Response Team (PRT) is comprised of the following staff members and reports to Executive Management.

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

The Pandemic Response Team is 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 from the norm
- Coordination of preparation for a campus exposure
 - Maintain contact information for local emergency services
- Cleaning and disinfection efforts

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 Fever of Chills Shortness of breath or difficulty breathing Fatigue Muscle or body aches Headache and/or congestion Sore Throat New loss of taste or smell Nausea or vomiting

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

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

- Remain/Return home
- Consider getting tested and/or or isolate from others for at least 5 days (regulations may vary by state) or until symptoms resolve
- If test results are negative, isolation is no longer required
- If test results are positive
 - o Isolate from others for at least 5 days starting from 1st full day after symptoms developed
 - Wear a mask around others
 - Contact a medical professional and follow additional guidance provided re: selfmonitoring, testing, etc.
 - Contact Associate Director or Direct Supervisor 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 definition)
 - Supervisor and/or staff should contact Human Resources for assistance in determining what is needed. STAFF must provide required documentation if they are unable to return by day 6.
- 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 fever-free for 24 hours without fever-reducing medication
 - **STAFF** must provide required documentation if they are unable to return by day 6.
 - **Must** wear a mask from day 6-10 to complete isolation period

COVID EXPOSURE: Individuals exposed to the virus that causes COVID-19 should:

- Contact Associate Director or Direct Supervisor 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 definition)
- Follow CDC guidance regardless of vaccination status, or previous COVID-19 infection (local state regulations may require additional action)
- Wear a mask around others as soon as you find out you were exposed for 10 full days

- If symptoms are present or develop, follow the previous guidance for Individuals experiencing symptoms of COVID-19.
- If no symptoms are present, isolation is not required
 - A mask must be worn around others for 10 days starting from 1st full day after exposure
 - o Take extra precautions around people more likely to get very ill from COVID-19
 - Get tested 5 full days after exposure and follow guideline based on test results

COVID POSITIVE: Individuals who test positive for COVID-19 should:

- Remain home
- Contact Associate Director or Direct Supervisor 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 definition)
- Follow CDC guidance regardless of vaccination status, or previous COVID-19 infection (local state regulations may require additional action)
- Wear a mask around others
- o Contact a medical professional and follow any additional guidance provided
- Isolate from others for at least 5 days starting from 1st day after (regulations may vary by state)
 - If no symptoms were present (asymptomatic): isolation may end after day 5.
 Continue to wear a mask around others for an additional 5 days. If unable to wear a mask, then isolate for 10 full days
 - If symptoms were present: isolation may end after day 5 if symptoms have improved and it has been at least 24 hrs. without 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
- STAFF may need to follow the normal LOA process. Supervisor and/or staff should contact Human Resources for assistance in determining what is needed. Staff must provide required documentation if unable to return to work by day 6. Staff should not return to work without HR approval
- 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.
- Healthcare provider may also recommend a longer isolation or mask period based on symptoms, severity or other health considerations

* FREE COVID-19 TESTING can be found at http://testinglocator.cdc.gov

OTHER COMMUNICABLE DISEASE OR INFECTION: Individuals experiencing symptoms (nonemergency) of illness other than COVID

There are other contagious illnesses that can present similar symptoms to COVID but may not be COVID related. Such as, but not limited to; Cold, Flu, Pneumonia, Strep Throat, Measles, Chicken Pox, Monkeypox, etc.

Individuals experiencing symptoms of illness that may be similar to COVID-19, but have been determined by a medical professional to be unrelated to COVID, must follow the guidance provided above. However, recommendations regarding timeframes for quarantine and return to work/school may vary depending on the nature and severity of the illness and guidance of the respective medical professional. At a minimum, individuals that are experiencing symptoms commonly associated with a contagious illness should remain home until symptoms have resolved, avoid close contact with others, take standard precautions and practice appropriate hygiene as noted below to prevent transmission.

• Hand Hygiene - refers to both washing with plain or anti-bacterial soap and water and to the use of alcohol gel to decontaminate hands. Keeping hands clean through improved hand hygiene is one of the most important steps to avoid getting sick and spreading germs to others. Frequent

use of hand sanitizer should be encouraged, especially during the cold and flu season (October through May).

• **Respiratory Hygiene (Cough Etiquette**) - measures to avoid spread of respiratory secretions should be promoted to help prevent respiratory disease transmission. "Cover Your Cough" posters are available free for download from the Center for Disease Control website (<u>www.cdc.gov</u>). These posters should be placed in the classrooms, restrooms and common areas of the campus in conspicuous locations.

The following details the expected protocol in the event a student or employee reports an occurrence of a specific disease. (*This list is not all-inclusive and if a student or employee reports any other infectious disease not listed, please consult with the campus RCD for direction).

CONJUNCTIVITIS (Pink Eye) - is an inflammation of the thin, clear lining of the white of the eye and inner eyelid, giving the eye a pink or reddish color. The affected individual may return to school 24 hours after antibiotic treatment has begun and/or present a note from physician indicating treatment has begun or that there is no risk of passing the infection on to others.

HEPATITIS A – is a contagious liver disease which is usually spread when a person ingests fecal matter—even in microscopic amounts—from contact with objects, food, or drinks contaminated by feces or stool from an infected person. The campus director must notify those at risk that there has been a case of "Hepatitis A" reported while at the same time protecting the identity of the affected individual. The affected individual must present a note from a physician indicating that he/she is well enough to return to school/work and that there is no risk of passing the infection on to others.

HEPATITIS B – is a chronic contagious liver disease which can be spread by direct contact with infected or contaminated blood. Therefore, Medical Assistant and Dental Assistant students that are known to be infected with Hepatitis B must be excluded as a "patient" whenever invasive procedures or procedures that result in exposure to bodily fluids are performed. The student's privacy must be maintained and the reason for his/her exclusion must not be disclosed. The student must also present a note from a physician indicating that he/she is well enough to attend school.

HIV/AIDS – is the human immunodeficiency virus that can lead to acquired immune deficiency syndrome, or AIDS which can be spread by blood to blood contact or when infected blood comes in contact with mucous membranes. Therefore, Medical Assistant and Dental Assistant students and staff that are HIV positive must be excluded as a "patient" whenever invasive procedures or procedures that result in exposure to bodily fluids are performed. Privacy must be maintained and the reason for his/her exclusion must not be disclosed. A note from a physician indicating that he/she is well enough to attend school should be presented.

MENINGITIS - Meningitis is a disease caused by the inflammation of the protective membranes covering the brain and spinal cord known as the meninges. The severity of illness and the treatment for meningitis differ depending on the cause. Thus, it is important to know the specific cause of meningitis.

- Viral Meningitis is contagious and contact with an infected person may increase the chance of becoming infected with the virus that made them sick; however, there is only a small chance of developing meningitis as a complication of the illness. The affected individual must present a note from a physician indicating that he/she is well enough to return to school/work and that there is no risk of passing the infection on to others.
- **Bacterial Meningitis** is contagious and classmates and/or co-workers would be considered at increased risk of getting the infection and should consult their physician. The campus director must notify those at risk that there has been a case of "bacterial meningitis" reported while at the same time protecting the identity of the affected individual. The affected individual must present a note from a physician indicating that he/she is well enough to return to school/work and that there is no risk of passing the infection on to others.

MRSA (Methicillin-resistant Staphylococcus aureus) - MRSA is transmitted most frequently by direct skin-to-skin contact. The affected individual must present a note from a physician indicating that he/she is well enough to return to school/work and that there is no risk of passing the infection on to others.

TUBERCULOSIS (TB) – is a contagious and potentially life-threatening infectious disease caused by a bacterium called Mycobacterium tuberculosis. There are two types of TB infection:

- Latent TB Infection (LTBI) TB bacteria can live in your body without making you sick. This is called LTBI. The only sign of TB infection is a positive reaction to the <u>tuberculin skin test</u> or <u>special TB blood test</u>. People with latent TB infection are not infectious and cannot spread TB bacteria to others. If a student or employee has a positive TB test, but has LTBI, a note from a physician that there is no risk of passing the infection on to others is sufficient.
- **TB Disease** People with TB disease may spread the bacteria to people they spend time with every day. The TB bacteria are spread from person to person through the air and classmates and/or co-workers would be considered at increased risk of getting the infection and should consult their physician. The campus director must notify those at risk that there has been a case of "tuberculosis" reported while at the same time protecting the identity of the affected individual. The affected individual must present a note from a physician indicating that he/she is well enough to return to school/work and that there is no risk of passing the infection on to others.

HAND FOOT AND MOUTH DISEASE (HFMD) – is a common viral illness that usually affects infants and children younger than 5 years old. However, it can sometimes occur in adults. Symptoms of hand, foot and mouth disease include fever, mouth sores, and a skin rash. We are not required to notify, nor does the Health Department recommend that we notify our students if someone is affected with this in a campus. We just need to make sure the student does not return to class, probably for 3 - 6 days, until all of the lesions have dried up. It is also recommended that we get a doctor's release for the student's return to school. You will need to stress good hand washing and follow the normal cleaning and sterilizing procedures.

Preventative Protocols to Minimize Exposure to

Preventative Protocols	
Campus Signage	Posted notices, for reception, classroom, restrooms etc. including CDC guidelines on distancing, handwashing, sanitizing, etc. <i>Documents stored along with this one in the Operations Folder.</i>
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: <u>Click Here for Guidelines</u>
	Ensure that Janitorial service follows the "Enhanced Cleaning Work Instructions for Education Environments" document at the end of the document.
Eliminate/Reduce sharing of office tools and workspace	Avoid using other employees' phones, desks, offices or other work tools and equipment, when possible.

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

Mask Policy

Following the CDC, federal and local government updates to mask mandates. Ross modified our mask policy for staff and students as follows;

Revised effective 10.14.22:

- Masks will <u>not</u> be required on Ross campus/office for individuals (regardless of vaccination status) who;
 - o Are not currently ill or experiencing symptoms of illness
 - Have not tested positive for COVID-19
 - Have not recently been exposed to someone who has tested positive COVID.
- Masks <u>will</u> be required on Ross campus/office in accordance with our Health & Safety Plan, for individuals who;
 - Are experiencing symptoms commonly associated with illness (but have been determined by a medical provider to not be contagious)
 - Individuals experiencing symptoms of illness that are commonly associated with COVID-19 or other contagious illness, must follow the guidance provided in the Health & Safety Plan.
 - Have tested positive for COVID-19 and returning from required isolation days 6-10 (for extended isolation periods Human Resources will advise on length of mask requirement).
 - Have recently been directly exposed to someone who has tested positive for COVID-19
 - If symptomatic following required isolation days 6-10
 - In asymptomatic 10 days following date of exposure
 - Masks can be worn at any time based on personal preference.
 - Masks are recommended for individuals that are immunocompromised or at high risk of illness, or reside with someone that is.

Travel Policy

In the interest of the welfare of our staff and students, Ross eliminated all non-essential travel as part of our preventative protocols during the COVID-19 pandemic. For business purposes, effective 4.1.22 all non-instructional travel was suspended unless specifically approved by our CEO. Going forward, to support our Health & Safety measures, the following prohibitions also apply to travel.

Individuals experiencing symptoms of illness, COVID symptoms, who have tested positive for COVID
or been in close contact with someone that has tested positive are also prohibited from travel for
Ross and should follow the stipulations outlined in the Health & Safety Plan.

Social Distancing Protocol

Social distancing is a simple, yet very effective, mechanism to prevent the spread of contagious illnesses. 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
- Potluck events with shared food items are prohibited at this time.
- Avoiding touching surfaces touched by others, to the extent feasible
- Avoiding anyone who appears to be sick, or who is coughing or sneezing

Disinfection Measures

Our janitorial services will follow CDC guidelines for sanitizing education environments: Click <u>Here</u> 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, <u>cmulenga@rosseducation.edu</u>, 810-956-4669.

Work from Home Policy

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

Currently, the following campus roles, by definition, cannot be worked from home: Associate Director, Student Services, 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 Holdings, Inc.

Ross does not, as a rule, grant work from home requests unless the job was initially defined as remote.

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.

Other Emergency Situations

If managers have other emergency situations, please refer to the Ross Emergency Management Plan.