



Abcote Institute COVID-19 Preparedness & Response Plan

General

The following COVID-19 preparedness & response plan has been established for Abcote Institute in accordance with the requirements in [Executive Orders & Directives](#) for COVID-19 issued by the State of Michigan Department of Health and Human Services, the OSHA [Guidance on Preparing Workplaces for COVID-19](#), and the latest [guidance](#) from the US Centers for Disease Control and Prevention (CDC). The purpose of this plan is to minimize or eliminate employee, student, and visitor exposure to SARS-CoV-2.

The EOs, OSHA guidance, and CDC guidance for COVID-19 have general safeguards applicable for all workplaces and specific safeguards industries. Abcote's compliance and operational leadership have read these guidance documents carefully, found the safeguards appropriate to Abcote Institute based on its type of business or operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan.

As the COVID-19 situation evolves applicable guidance is periodically updated. Abcote Institute's compliance and operational leadership will be responsible for visiting the EO webpage and CDC guidance webpage regularly for the latest information and for revising the plan as necessary. The EOs are found at https://www.michigan.gov/whitmer/0,9309,7-387-90499_90705---,00.html and at https://www.michigan.gov/coronavirus/0,9753,7-406-98178_98455---,00.html. The CDC guidance documents are found at <https://www.cdc.gov/coronavirus/2019-ncov/communication/guidance-list.html?Sort=Date%3A%3Adesc>. This plan reflects the EOs and CDC guidance as of 10/30/2020.

Abcote Institute has designated one or more worksite supervisors to implement, monitor, and report on the COVID-19 control strategies developed in this plan. A list of worksite supervisors is located in appendix A of this plan. The supervisor will remain on-site at all times when employees are present on site. An on-site employee may be designated to perform the supervisory role.

The plan is readily available at <https://www.abcote.edu>.

Exposure Determination

Abcote Institute has evaluated routine and reasonably anticipated tasks and procedures for all employees to determine whether there is actual or reasonably anticipated employee exposure to SARS-CoV-2. Abcote's compliance and operational leadership was responsible for the exposure determination.

Abcote Institute has determined that its employees' jobs fall into only the lower exposure and medium exposure risk categories as defined by the OSHA Guidance on Preparing Workplaces for COVID-19:

- **Lower Exposure Risk Jobs.** These jobs do not require contact with known or suspected cases of COVID-19 nor frequent close contact (for example, within six feet) with the general public. Workers in this category have minimal occupational contact with the public and other coworkers. Examples are small offices, small manufacturing plants (less than 10 employees), small construction operations (less than 10 employees), and low-volume retail establishments, provided employees have infrequent close contact with coworkers and the public.
- **Medium Exposure Risk Jobs.** These jobs are those that require frequent or close contact (for example, within six feet) with people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients. Examples are most jobs at manufacturing plants, construction sites,

schools, high-volume retail settings, and other high-population-density work environments.

Abcott’s compliance and operational leadership verifies that Abcott Institute has no high-risk exposure jobs. High exposure risk jobs have high potential for exposure to known and suspected cases of COVID-19. Examples are most jobs in healthcare, medical transport, nursing homes and residential care facilities, mortuaries, law enforcement, and correctional facilities. This sample plan is not intended for employers who have high exposure risk jobs.

Abcott Institute has categorized its jobs as follows:

(NOTE: Some jobs may have more than one type of exposure risk depending on the task or qualifying factors.)

Job/Task	Exposure Risk Determination (Lower or Medium)	Qualifying Factors (For Example, No Public Contact, Public Contact)
Admissions Department	Medium	Public close contact - Moderate
Financial Aid Department	Medium	Public close contact - Moderate
Education/Faculty	Medium	Public close contact - Moderate
Career Services	Medium	Public close contact - Moderate
Other Administration	Medium/Lower	Public close contact - Moderate/None

Engineering Controls

Abcott Institute has implemented feasible engineering controls to minimize or eliminate employee exposure to SARS-CoV-2. Engineering controls involve isolating employees from work-related hazards using ventilation and other engineered solutions. In workplaces where they are appropriate, these types of controls reduce exposure to hazards without relying on worker behavior and can be the most cost-effective solution to implement.

For lower exposure risk jobs, new engineering controls are not required. For medium exposure risk jobs, engineering controls can include:

- Installing physical barriers (such as clear plastic sneeze guards) between coworkers or between workers and customers.

Operational and educational leadership will be responsible for seeing that the correct engineering controls are chosen, installed, maintained for effectiveness, and serviced when necessary.

The following engineering controls have been implemented:

Job/Task	Engineering Control
Meeting with students	Fixed and portable physical barriers have been purchased and installed to create barriers where 6ft social distancing cannot be maintained.

Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee, student, and visitor exposure to the hazard. Operational, compliance, and educational leadership will be responsible for seeing that the correct administrative controls are chosen, implemented and maintained for effectiveness.

The following administrative controls have been established for Abcott Institute:

Job/Task	Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Customers)
All employees, students, & visitors	When possible maintain at least six feet from everyone on campus.
Abcott Institute – emphasis on entry and common areas.	Use ground markings, signs, and physical barriers to prompt employees to remain six feet from others.
All employees	Promote flexible work hours (staggered shifts) to minimize the number of employees in the facility at one time.
All employees and students	Establish alternating days or extra shifts to reduce the total number of employees and students in the facility at a given time.
All employees, students, & visitors	Limit face-to-face meetings. Communicate with others through phone, email, teleconferencing, and web conferencing.
All employees, students, & visitors	Restrict the number of people in the building at any given time.
All employees, students, & visitors	Minimize the sharing of tools, equipment, and items.
All employees, students, & visitors	Provide employees, students, and visitors with non-medical grade face coverings (cloth face coverings).
All employees, students, & visitors	Require employees, students, and visitors to wear cloth face coverings.
All employees and students	Keep employees and students informed about symptoms of COVID-19 and require sick people to stay at home until healthy again.
All employees, students, and visitors.	Encourage proper cough and sneeze etiquette by employees, including covering coughs and sneezes and coughing and sneezing in one's elbows rather than hands.
All employees	Ensure that sick leave policies are flexible and consistent with public health guidance, so employees do not go to work sick.
All employees and students	Do not require a healthcare provider's note for employees and students who are sick with acute respiratory illness to validate their illness.
All employees	Maintain flexible policies that permit employees to stay home to care for a sick family member.
All Employees	Implemented a Remote Work Policy
All employees and students	Implemented a Social Distance and Conduct Policy requiring employee and student acknowledgement.

Hand Hygiene

Operational and educational leadership will be responsible for seeing that adequate handwashing facilities are available in the workplace and that regular handwashing is required. Frequency of such handwashing will be determined in part by factors such as when and how often the employees' hands are potentially exposed to SARS-CoV-2. Abcott Institute will provide time for employees to wash hands frequently and to use hand sanitizer.

Disinfection of Environmental Surfaces

Abcott Institute will increase facility cleaning and disinfection to limit exposure to COVID-19, especially on high-touch surfaces (for example, door handles), paying special attention to parts, products, and shared equipment. Abcott Institute will make cleaning supplies available to employees upon entry and at the worksite.

Operational and educational leadership will be responsible for seeing that environmental surface in the workplace is cleaned and disinfected. Frequency of such disinfection will be determined in part by factors such as when and how often the environmental surfaces are potentially exposed to SARS-CoV-2. When choosing cleaning chemicals, Abcott Institute will consult information on Environmental Protection Agency (EPA)-approved disinfectant labels with claims against emerging viral pathogens. Products with EPA-approved emerging viral pathogens claims are expected to be effective against SARS-CoV-2 based on data for harder to kill viruses. The manufacturer’s instructions for use of all cleaning and disinfection products will be strictly adhered to.

The following is a list of environmental surfaces, methods used to disinfect, and the frequency of such disinfection:

Surface	Method/Disinfectant Used	Schedule/Frequency
Door handles & other common area high-touch surfaces	Wiped and sanitized w/ hospital grade germicidal cleaner	Once per day minimum or in-between employee/student shifts.
Classrooms and labs	Wiped and sanitized w/ hospital grade germicidal cleaner. Wipes or other cleaners are available for employees and students to disinfect their area.	Once per day minimum or in-between employee/student shifts. Employees and students are allowed to disinfect their areas as frequently as they desire.
Offices and workstations	Wiped and sanitized w/ hospital grade germicidal cleaner. Wipes or other cleaners are available for employees to disinfect their area.	Once per day minimum or in-between employee/student shifts. Employees are allowed to disinfect their areas as frequently as they desire.

Abcott Institute will perform enhanced cleaning and disinfection after persons confirmed to have COVID-19 have been in a work area. In the interim, that work area will be temporarily closed, and employees will be sent home or relocated. Operational leadership will be responsible for seeing that this protocol is followed.

Personal Protective Equipment (PPE)

Abcott Institute will provide employees with personal protective equipment for protection from SARS-CoV-2 appropriate to the exposure risk associated with the job. The PPE policy will follow the CDC and OSHA guidance applicable to the industry and types of jobs at the workplace, and it will be in accordance with latest EOs.

All types of PPE are to be:

- Selected based upon the hazard to the worker.
- Properly fitted and periodically refitted as applicable.
- Consistently and properly worn.

- Regularly inspected, maintained, and replaced, as necessary.
- Properly removed, cleaned, and stored or disposed of, as applicable, to avoid contamination of self, others, or the environment.

Abcott Institute will provide non-medical grade face coverings (cloth face coverings) to employees. Abcott Institute will require employees to wear face coverings when they cannot consistently maintain six feet of separation from students when in a public space. Abcott Institute will consider face shields when employees cannot consistently maintain three feet of separation from other individuals in the workplace.

The following type(s) of PPE have been selected for use:

Job/Task	PPE
All employees, students, and visitors	Face coverings are currently available at no cost
All employees, students, and visitors	Gloves are currently available at no cost
Employees and students who cannot maintain a 3ft social distance	Face shields are available per request

Health Surveillance

Abcott Institute has implemented a screening protocol to identify known or suspected cases of COVID-19 among employees, students, and visitors and isolate them from the remainder of people on site. Operational, educational, and compliance leadership will be responsible for ensuring that all required health surveillance provisions are performed.

As people enter Abcott at the start of each shift, Abcott Institute will have employees, students, and visitors self-screen for COVID-19 symptoms. Abcott Institute will have employees, students, and visitors complete a questionnaire covering the signs and symptoms of COVID-19 and their exposure to people with suspected or confirmed COVID-19. A no-touch thermometer will be used for temperature screening of employees, students, and visitors. Abcott Institute will similarly screen contractors, suppliers, and any other individuals entering.

Employees have been directed to promptly report any signs and symptoms of COVID-19 to their direct supervisor and/or COVID-19 site supervisor before and during the work shift. Abcott Institute has provided employees with instructions for how to make such a report to the employer.

Students have been directed to promptly report any signs and symptoms of COVID-19 to their instructor and/or campus Vice President of Operations.

Employees, students, and visitors may also email BOB@Abcott.edu to report a confirmed or suspected case of COVID-19.

Abcott Institute will physically isolate any employees with known or suspected COVID-19 from the remainder of the workforce, using measures such as, but are not limited to:

- Not allowing known or suspected cases to report to or remain at their work location.
- Sending known or suspected cases to a location (for example, home) where they are self-isolating during their illness.
- Assigning known or suspected cases to work alone at the location where they are self-isolating during their illness.

Abcott Institute will not discharge, discipline, or otherwise retaliate against employees who stay at home or who leave work when they are at particular risk of infecting others with COVID-19.

When an employee, student, or visitor is identified with a confirmed case of COVID-19, within 24 hours, a designated COVID-19 site supervisors will notify any employees, students, or visitors who may have come into contact with the person who is the confirmed case of COVID-19. When notifying employees, students, and visitors, Abcott Institute will not reveal the name or identity of the confirmed case.

Abcott Institute will allow employees with a confirmed or suspected case of COVID-19 to return to the workplace only after they are no longer infectious according to the latest guidelines from the CDC.

Training

The Vice President of Operations shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

Abcott Institute will train workers on, at a minimum:

1. Routes by which the virus causing COVID-19 is transmitted from person to person.
2. Distance that the virus can travel in the air, as well as the time it remains viable in the air and on environmental surfaces.
3. Symptoms of COVID-19.
4. Workplace infection-control practices.
5. The proper use of PPE, including the steps for putting it on and taking it off.
6. Steps the worker must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
7. How to report unsafe working conditions.

The Vice President of Operations shall create a record of the training. The record will list the names of the employees trained, the training date, name of trainer, and content of training.

Recordkeeping

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

1. Training records.
2. A record of daily entry self-screening results for all students, and visitors entering the workplace, including a questionnaire covering signs and symptoms of COVID-19 and exposure to people with suspected or confirmed COVID-19.
3. When an employee is identified with a confirmed case of COVID-19, a record will be established indicating that within 24 hours any employees, students, or visitors who may have come into contact with the person who was the confirmed case of COVID-19 has been notified.

Operational and educational leadership will ensure that the records are electronically archived.

Appendix A

Worksite supervisors to implement, monitor, and report on the COVID-19 control strategies. The supervisor must remain on-site at all times when employees are present on site. An on-site employee may be designated to perform the supervisory role.

Campus	Building	Name	Position	Email
Abcott	Downstairs	Bob Singh	Vice President of Operations	Bob@abcott.edu
Abcott	Downstairs	Dimple Singh	President	Dimple@abcott.edu
Abcott	Downstairs	Kathy Galasso	Director of Admissions	KGalasso@abcott.edu
Abcott	Suite 205	Chris Horler	Director of Financial Aid	CHorler@abcott.edu
Abcott	Downstairs	Cynthia Norman	Program Director	CNorman@abcott.edu
Abcott	Suite 205	Amanda Howe	Administrative Assistant	AHowe@abcott.edu
Abcott	Nursing	Elizabeth Shaifer	Director of Nursing	EShaifer@abcott.edu
Abott	Surg Tech	Angela Koscierzynski	Director of Surgical Tech	AKoscierzynski@abcott.edu



COVID-19 SOCIAL DISTANCING AND CONDUCT POLICY

The following COVID-19 social distancing and conduct policy has been established for Abcote Institute in accordance with the requirements in [Executive Orders & Directives](#) for COVID-19 issued by the State of Michigan Department of Health and Human Services, the [OSHA Guidance on Preparing Workplaces for COVID-19](#), and the latest [guidance](#) from the US Centers for Disease Control and Prevention (CDC). The purpose of this policy is to minimize or eliminate employee, student, and visitor exposure to SARS-CoV-2.

1. In order to enter Abcote Institute, an appropriate mask or face covering that covers both the nose and mouth is required.
2. A mask or face covering must be worn at all times if six foot social distancing cannot be maintained or when in a public space.
3. Avoid touching your eyes, nose, and mouth.
4. Further social distancing requirements may be required depending on the activity involved. Signage and school official guidance will be provided in these events.
5. Wash your hands often with soap and water for at least 20 seconds. Use an alcohol-based hand sanitizer that contains at least 60% alcohol if soap and water are unavailable.
6. Cover coughs and sneezes with a tissue or sleeve.
7. Clean and disinfect frequently touched objects.
8. Anyone who is ill or has symptoms of illness (Click [here](#) for list of COVID-19 symptoms) should remain at home, contact their supervisor by phone or email, and only return once they have been directed to by their supervisor. Abcote Institute will utilize [CDC guidance](#) when determining when an employee, student, or visitor may return to Abcote Institute after experiencing illness symptoms.
9. Abcote Institute reserves the right to deny entry to anyone who does not meet Abcote Institute's health screening standards, which includes a COVID-19 self-screening health questionnaire attestation and temperature check using a no-touch thermometer. If a person's temperature reflects a fever (100.4 °F or 38 °C and above) they will be denied entry.
10. Support contact tracing efforts. Students, employees, and visitors who are diagnosed with COVID-19 after visiting Abcote Institute, are asked to notify campus administration immediately. When an employee, student, or visitor is identified with a confirmed case of COVID-19, within 24 hours, Abcote Institute will notify any employees, students, or visitors who may have come into contact with the person with a confirmed case of COVID-19.

Health Insurance Portability and Accountability Act (HIPAA) privacy rules and Family Educational Rights and Privacy Act (**FERPA**) rules will be followed during the reporting process.

I have read and agree to adhere to the above policy requirements. I further understand that the Abcote Institute COVID-19 Preparedness and Response Plan is available for review at www.abcote.edu.

Signature

Date



COVID Response Plan for a Confirmed Infection in Workplace -19

Purpose:

The purpose of the COVID-19 Response Plan for a Confirmed Infection in the Workplace is to define the procedures for both reporting and responding to a confirmed COVID-19 infection in the workplace.

Reporting Procedures:

Abcote Institute strongly encourages any person who has entered Abcote Institute then later tests positive for COVID-19 to notify school administration immediately. Each campus has designated site supervisors (listed in Appendix A of COVID-19 P&R Plan) that are responsible for responding to reported cases. Further, Abcote has established an email group of all site supervisors to ensure all reported incidents are documented and responded to timely.

Response Procedures:

Site Supervisors are responsible for ensuring reported cases of COVID-19 are responded to timely and in accordance with this plan. The following steps are required to be taken within 24 hours of receiving a report.

1. Complete COVID-19 incident report.
2. Review daily sign-in sheets to determine who may have been exposed to person with infection.
3. Contact persons who may have been exposed, notifying them that they may have been infected while on campus. Confidentiality must be maintained during this process to ensure adherence to both Health Insurance Portability and Accountability Act (HIPAA) privacy rules and Family Educational Rights and Privacy Act (**FERPA**) rules. **DO NOT DISCLOSE NAMES OR PROVIDE IDENTIFYING INFORMATION OF THE PERSON WHO TESTED POSITIVE FOR COVID-19.**
4. Schedule an immediate deep cleaning and sanitation of facilities. Certain incidents may require short-term facility closures to ensure cleaning efforts have been completed prior to anyone entering the facility.



COVID-19 Incident Report for a Confirmed Infection in the Workplace

1. Name of person who tested positive for COVID-19(attach test results):

2. Is the person a (circle one): STUDENT EMPLOYEE VISITOR

3. Detailed explanation of exposure (E.g. *“Started having symptoms on 4/13, tested positive 4/19”*):

4. What location(s) and building(s) were entered (If multiple locations, a site supervisor must be contacted at each location. Further, an incident report will need to be completed at each location). Please include visit purpose, date(s), and times of visits:

5. List all close contacts as defined by the Center For Disease Control(CDC):

Signature of School Official Completing Report

Date



COVID-19 Remote Work Policy

Purpose:

The purpose of Abcott Institute's COVID-19 Remote Work Policy is to reduce the amount of employees in the workplace and minimize or eliminate employee, student, and visitor exposure to SARS-CoV-2. Further, the [Michigan Occupational Safety and Health Administration \(MIOSHA\)](#) and the [Michigan Department of Health and Human Services \(MDHHS\)](#) require strict adherence to remote work guidelines.

Policy:

Abcott Institute prohibits in-person work for employees to the extent that their work activities can feasibly be completed remotely. Given Abcott's form of student-centric, high-support, hands-on education, the vast majority of our job tasks are best performed via in-person interaction with staff and students. Therefore, employees will likely work in an environment (remote or in-person) that parallels the students' learning environment. The students' learning environment will depend on several elements including, but not limited to the courses being taught during the term, the current pandemic risk in the community, and the regulations in effect at the time. There may be some specific roles, which require less in-person interaction that may be able to be performed effectively outside of Abcott Institute. It is Abcott's goal to balance the need to deliver a high-quality educational experience for our students with the need to provide a safe environment for those students and the Abcott staff that support them.