



EMERGENCY PREPAREDNESS PLAN

**517 Ash Street
Scranton, PA 18509**

Revised: April 2024

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Official Statement

The Emergency Preparedness Plan (EPP) that follows is the official policy of Fortis Institute located in Scranton, PA. It is the result of a comprehensive review and update of school policies regarding protecting the employees and students at the school during the occurrence of an unforeseen event. We support its recommendations and commit the school's resources to ongoing training, exercises, and maintenance required to keep it current. We also recognize the importance of working in *cooperation with local emergency response agencies to enhance this plan*. This plan is a blueprint that relies on the commitment and expertise of individuals within and outside of the school community. We have ensured that this plan conforms to local, state, and federal law. Furthermore, clear communication with emergency management and law enforcement officials and ongoing monitoring of emergency management practices and advisories is essential.

A record of updates to this document may be found in Appendix 8.

Susan Lynch
Campus President

Susan Lynch
Signature

04/15/2024
Date

Introduction

Purpose

The purpose of the Emergency Preparedness Plan (EPP) is to ensure the safety of students, faculty, staff, and visitors to Fortis Institute in the event of an emergency.

The plan describes emergency communication, response, and evacuation procedures.

The goals are to:

- Protect lives.
- Prevent injury.
- Protect property.
- Preserve the sustainability of the organization throughout the emergency.
- Prepare for dealing with emergencies and mitigate their negative consequences.

Copies of the Emergency Preparedness Plan are maintained with the Campus President, the Leadership Team, the Program Directors, the Business and Finance Office Staff and the Registrar.

Distribution of Plan and Training

- The Emergency Preparedness Plan is distributed to all faculty and staff during the new hire on-boarding process.
- Faculty and staff receive Emergency Preparedness Plan annual in-service training/updates.
- Students are trained on the Emergency Preparedness Plan during the New Student Orientation.
- A copy of the Emergency Preparedness Plan is posted on the Fortis Institute, 'Ignite to Learn' site.

Emergency Notification and Telephone Numbers

Call **9-1-1** to report all emergencies, including fire, injuries requiring medical assistance, bomb threats, hazardous materials incidents, or any other incident requiring rapid response. Provide all information requested, including name, location, nature of the emergency, and contact information.

Fortis Institute	570-558-1818
Campus President - Susan Lynch	570-558-1818, ext. 1911
Front Desk Staff - Theresa Maximov	570-558-1818, ext. 1910
Director of Nursing - Katrina Maurer	570-558-1818, ext. 1923
Annex Building Staff - Christopher Jones and Kirsten Smith	570-558-1818, ext. 1917 (Chris) 570-558-1818, ext. 1912 (Kristen)
Dental Building Staff - Anita Bendowski	570-558-1818. ext.1947
Emergency Coordinators - Susan Lynch and Christopher Jones	570-558-1818, ext. 1911 (Susan) 570-558-1818, ext. 1917 (Chris)

Emergency Response Team

The Fortis Institute Emergency Response Team is responsible for preparing, responding to, and recovering from an emergency, including:

- Ensuring that all elements of this Emergency Preparedness Plan are reviewed and updated as needed, but no less than annually.
- Ensuring proper emergency communication.
- Assigning roles and responsibilities to school individuals in the event of an emergency and conducting training for those individuals to perform those responsibilities.
- Organizing practice emergencies to test the efficiency and appropriateness of the elements of this Emergency Preparedness Plan.
- Acting as management during an emergency until normal operations have resumed; and communicating the situation to the corporate headquarters.

The Emergency Response Team shall include the Campus President and key management team members and associated personnel from the following departments:

- Administration: Campus President/All Department Directors
- Academics: Director of Education/All Programs Directors/Registrar
- Front Office: Administrative Assistant
- Maintenance: Building Coordinator
- Incident/OSHA Coordinator
- Zone Coordinators

Building Coordinator

A Building Coordinator is a staff member trained to know the floor plans of the school space and the emergency evacuation procedures for any emergency—medical, fire, tornado, etc.

A Building Coordinator may be responsible for:

- Relaying status report information to the emergency agency/agencies involved (e.g., fire department, police, paramedics, emergency management, etc.).
- Coordinating with the emergency agency/agencies any needed evacuations or other emergency actions.

A Building Coordinator may work with the Emergency Response Team to:

- Coordinate emergency planning activities.
- Schedule training.

Incident Coordinator

The Campus President or designee serves as the Incident Coordinator and is trained to assist efforts in the event of an emergency. This individual also oversees the compliance of the school, employees, and students regarding OSHA and other areas related to safety.

The Incident Coordinator, working closely with the Building Coordinator, assumes responsibility for implementing the building emergency plan at the time of the incident, providing leadership until personnel with more experience arrive on scene. Responsibilities may include the following:

- Ensuring that all Emergency Response Team members are aware of emergencies.
- Distributing the Emergency Response Plan updates.

- Working with other Emergency Response Team members to evaluate an emergency.

Medical Response Team (MRT)

Medical Response Team members are members of the Emergency Response Team who have been trained in medical emergencies. Responsibilities include the following:

- Providing first aid to those incurring a medical emergency until medical personnel with higher training arrive on the scene.
- Conducting a primary assessment of the medical emergency situations and reporting this assessment to appropriate personnel.

Medical Response Team members should immediately identify themselves as such to any personnel responding to the incident.

Zone Coordinators

The Zone Coordinators are faculty and staff members who understand and are prepared to facilitate a safe and effective response to any emergency. Responsibilities include the following:

- Knowing how to correctly respond to and summon help for a medical emergency.
- Knowing how to correctly report a fire or smoke emergency using the 911 emergency numbers.
- Knowing the locations of the fire extinguishers in their area and how to use them.
- Knowing how to correctly respond to a fire warning alarm.
- Knowing the facilities lock-down/shelter in place procedure.
- Knowing designated shelter areas and precautions to take in the event of a tornado emergency.
- Becoming familiar with exit routes and knowing alternate exits to correctly respond to a call for an evacuation.
- Closing all opened doors as they evacuate an area.

Zone Coordinators should immediately identify themselves as such to any personnel responding to the incident.

Risk Assessment

The **Emergency Response Team** should conduct an initial Risk Assessment of the campus. It is recommended that this documentation be maintained on campus and updated quarterly or bi-annually by the same team. It is recommended that an OSHA Assessment be performed each year and a digital copy of the assessment results be kept on file in a secure location with other documentation related to the Emergency Preparedness Plan in a secure location. A template from OSHA or an agency such as Stericycle may be used.

If possible, enlist the assistance of local law enforcement to conduct a risk assessment for your school.

See **Appendix 5: Action Plan** that can be used as a template to record the minutes of the Emergency Response Team's meetings. The meetings of the Emergency Response Team may be included as a component of the campus leadership meetings.

This Emergency Preparedness Plan cannot cover every possible emergency or a crisis that might occur.

Nevertheless, it is a training tool that can reduce the number of injuries or deaths if put into action as soon as an emergency or a crisis develops. Time is a critical factor in the management of an emergency or a crisis.

One of the greatest mistakes campus presidents, deans, administrators, faculty, and staff make in crisis situations comes from not knowing what steps to take and in what order in each situation. This plan serves as a guide along with the most likely specific sequential steps to take. No guide can provide the exact steps as it is critical to evaluate the circumstances of the actual event and determine the most appropriate course of action. Some common events have been addressed to help you in an emergency. Each location should conduct a hazard assessment to identify all hazards that pose a risk to the facility and add any unique risks facing the campus that are not already covered in this Emergency Preparedness Plan. For example, if the campus is based in Florida, the hazard assessment would likely include identification of hurricanes and flooding as a risk facing the campus. In addition to natural disasters, the risk assessment may also identify risk factors such as areas of low security/high crime, and other geographically contingent variables.

Disaster and Crisis Recovery

There are many possible scenarios that can be considered as a "disaster" or "crisis" situation. Below, we have listed some possible situations that could result in loss of property and/or injury and require emergency action on the part of management supervisors, faculty, staff, and students. These scenarios include tornado; hurricane; flood; fire; explosion; hazardous material release; active shooter; bomb threat; power failure; and medical emergency.

Visitor Protocols

Purpose

The purpose of Visitor Protocols is to ensure the safety of students, faculty, and staff. The Campus Staff must ensure that any visitors will not:

- Pose a threat to students, faculty, and staff and to the premises.
- Distract others from their education or work.
- Be exposed to any danger or harm.

Visitor Definition

Anyone who meets one of the following criteria are defined as visitors:

- Admission appointments
- Business and personal visitors
- Delivery and vendor personnel
- Former students
- Former employees
- Friends
- Family including children
- Members of the public
- Current students without an identification (ID) and/or in street clothes

Policy

The following recommended procedures apply for all visitors:

- Sign in at the reception desk and show some form of ID.
- Sign in and out every time even if she/he is known by the front office.
- Wear a visitor ID badge while on campus.
- Return the visitor ID badge upon leaving the campus.
- On the sign-in sheet, indicate the purpose of the visit.
 - Admissions
 - Financial Aid
 - Administration appointment
 - Learning Resource Center (LRC)
 - Family
 - Children are not allowed in the classrooms, labs, or LRC due to safety factors. They may not be left in the reception room unattended. Anyone under 18 is considered a child.
 - Children of employees are only allowed to be with the employee but not in any classroom, lab, or the LRC.
 - Friend
 - Current student without ID
 - Delivery
 - Vendor
 - Repair person
 - Other – please explain.

- Areas of the school open to visitors
 - Administration offices
 - Restrooms
 - Classrooms only with prior authorization by the Director of Education, Campus President, or designee such as Program Director.
- Visitors must adhere to the same standards of conduct as employees and students.
- Employees are responsible for their visitors while inside the Campus.

Pre-enrollment

Pre-enrolling frequent visitors, like Admission and/or Financial Aid appointments, delivery or vendors may be accomplished by the department in charge providing a list to the Front Desk Staff each morning or evening.

Unauthorized Visitors

The Front Office Staff may ask any non-cooperative visitor to leave. If a visitor refuses to leave or is found in unauthorized areas without an ID, he/she will be asked to leave. Anyone encountering an issue with an unauthorized visitor should report to the Front Office Staff who will contact the administrative person in charge at that time. If there is a possibility of escalation, be prepared to call 9-1-1.

Signage

It is recommended that a sign be posted at the entrance informing all visitors and students without an ID badge to check-in with the Front Desk Staff.

Cyber Security and Threats

Cyber security, or information technology security, is the practice of securing networks, systems and any other digital infrastructure from malicious attacks or unauthorized access. Cyber threats face us each day and we must be prepared to safeguard all data. Some common cyber threats include Viruses, Malware, Spyware, Phishing attacks, Ransomware, Data Destruction, Data Breaches, and Natural Disasters.

Our institution is committed to preserving the confidentiality of the personal identifiable information (PII) collected during all phases of the education process. This includes PII information pertaining to both our students and employees. Policies, procedures, and mechanisms have been developed and implemented to safeguard the information that is obtained. These policies are outlined in our Information Security Program which is compliant with certain provisions of The Gramm-Leach-Bliley Act and NIST 800-171. These various policies are intended to detect, prevent, and respond to attacks, intrusions, system failures, and cyber threats.

Major areas covered by our information security program are:

1. Application Security
2. Information Security
3. Disaster Recovery
4. Network Security
5. Data Breaches

Application security encompasses measures or countermeasures that are taken during the development life cycle to protect applications from threats that can come through flaws in the application design, development, deployment, upgrade or maintenance. Our institution assesses applications for vulnerabilities and those vulnerabilities are remediated prior to production deployment to mitigate the risk of threats.

Information security protects information from unauthorized access to avoid identity theft and to protect privacy. Our information security policies are designed to protect the confidentiality, integrity and availability of the computer system and physical data from unauthorized access whether with malicious intent or not.

Disaster recovery planning is a process that includes performing risk assessment, establishing priorities, and developing recovery strategies in case of a disaster. Our information security team has data recovery and restoration plans in place for data recovery in case of an emergency or a crisis.

Network security includes activities to protect the usability, reliability, integrity, and safety of the network. Effective network security targets a variety of threats and stops them from entering or spreading on the network. Network security components include: 1.) Anti-virus and anti-spyware, 2.) Firewall, to block unauthorized access 3.) Intrusion prevention systems to prevent fast spreading threats, and 4.) Virtual Private Networks to provide secure remote access. These various

preventative measures have been implemented to ensure a secure experience within our network system and to help mitigate cyber threats.

Data breaches are defined as any “unauthorized disclosure, misuse, alteration, destruction, or other compromise of information.” Our information security program is designed to mitigate the risk of any data breaches and is committed to protecting our employees and students from illegal or damaging actions by individuals, either knowingly or unknowingly.

The policies and procedures outlined above have been implemented to mitigate the potential risks and cyber threats that face us every day. If any student or employee believes they have experienced a cyber-threat or potential data breach it should be reported directly to our Information Technology (IT) and Security team at <https://servicedesk.edaff.com>

The IT and Security Team will respond immediately with the appropriate action to take.

Severe Weather

Note: Adoption of the next section will depend upon severe weather events in the school's geographic location of Scranton, PA.

All communities are vulnerable to a variety of natural hazards, such as severe weather, including thunderstorms, flash flooding, snowstorms, and tornadoes.

There are several steps you can take to prepare for inclement weather:

1. Listen to weather updates and stay informed.
2. Be ready to evacuate, if necessary.
3. Keep away from windows and doors.
4. Consider buying a weather radio.
5. Have an emergency kit ready.

Tornado

The following table describes the difference between tornado and thunderstorm watches and warnings.

Watches	
<i>Conditions are favorable or expected but not occurring or imminent</i>	
Tornado	Atmospheric <i>conditions are favorable</i> for the development of severe thunderstorms capable of producing tornadoes.
Severe Thunderstorm	Atmospheric <i>conditions are favorable</i> for the development of severe thunderstorms (i.e. – producing hail at least 1" in diameter and/or 50 knot (58 mph) or greater wind speeds).

Warnings	
<i>Conditions are occurring or imminent</i>	
Tornado	A severe thunderstorm <i>has developed</i> and has either produced a tornado <i>or radar has indicated</i> intense low level rotation in the presence of atmospheric conditions conducive to tornado development
Severe Thunderstorm	A severe thunderstorm <i>has developed</i> , capable of producing hail greater than 1" diameter and/or 50 knot (58 mph) wind speeds.

- In areas where public tornado/severe thunderstorm warning sirens exist and have sounded, or local radio/television reports have indicated a tornado/severe thunderstorm warning, all school personnel, students, and visitors will immediately move to the hallways in the interior area of the building.
- Faculty will go with their students to the inside hallways.
- Class Roll will be taken by the faculty to ensure everyone is present.

- Emergency Response Team will go through the building to notify anyone who may not have heard the warning.
- No one will return to classrooms or offices until the “All Clear” alert is announced by a member of the Emergency Response Team.

Tornado – Damage/Injury

- Meeting of the Emergency Response Team will be held after a tornado has occurred.
- Initial meeting may include representation from the appropriate county emergency office.
- Members of the Emergency Response Team should be prepared to discuss how emergency procedures were or were not followed within their areas of responsibility.
- The Emergency Response Team will assess damage and report on power outages, safety of the building, and ways to secure the damaged sites.
- A list of injured parties will be compiled regarding medical attention sought through 911.
- The Emergency Response Team will assess the need to move classes from any damaged area.
- Depending on the severity of the situation, school may be cancelled, and students and employees sent home until further notice (as per below under the Hurricane section).
- Generally, Fortis Institute follows the opening/closing schedule of public institutions.
 - The Campus President or designee will determine when weather conditions justify cancellation of classes and/or closing of school.
 - Faculty and staff will be notified at school or home that the Institute will be closed because of a pending hurricane by a member of the Emergency Response Team.
 - School closings will be posted on the school’s web site and/or student portal.
 - If possible, Faculty will notify students in his/her classes about closing of school by cell phone or by posting an announcement in Canvas.
 - Shut down all equipment properly; disconnect power sources to the equipment
 - Signs regarding the closing will be posted.
 - The Building Coordinator will secure the building.
 - Post-closing information on Student and Faculty Portal.

In most cases a meeting of the Emergency Response Team will not be necessary. Situations in which a meeting may be called include:

- Continuing inclement weather has necessitated a major change in the academic schedule.
- An injury or death has occurred on campus that was weather-related.
- Damage to the facility that was caused by the severe weather.

Hurricane

Unlike tornados, hurricanes are slow moving, but dangerous storms. With the equipment that is now being used, hurricanes can be detected and tracked. They still cannot forecast exactly where they will make landfall, which makes hurricanes very unpredictable. When the first hurricane watch is announced, it is important to ensure that all students and employees remain calm. Panic must be avoided. This is the time to plan for the possible and to know what plan of action to execute, if necessary. Once the "watch" turns into a "warning," and the National Weather Center has determined that the probable path of the storm will be in the area of the school, the ERT will

announce procedures that should be taken by supervisors and employees.

Hurricane Watch

A hurricane watch means that hurricane conditions (sustained winds of 74 mph or higher) are *possible* within the specified area. A hurricane watch is issued 48 hours in advance of the anticipated onset of tropical-storm-force winds in an area.

During a hurricane watch, prepare your school and review your plan for evacuation in case a hurricane or tropical storm warning is issued. Listen closely to instructions from local officials.

Hurricane Warning

Hurricane warnings indicate that hurricane conditions (sustained winds of 74 mph or higher) are *expected* somewhere within the specified area. Because hurricane preparedness activities become difficult once winds reach tropical storm force (sustained winds of 39 to 73 mph), the hurricane warning is issued 36 hours in advance of the anticipated onset of tropical-storm-force winds to allow for important preparation.

During a hurricane warning, complete storm preparations and immediately leave the threatened area if directed by local officials.

- Unless otherwise notified, Fortis Institute will be open at regularly scheduled times.
- As a rule, Fortis Institute follows the opening/closing schedule of public institutions.
- All employees and students are expected to comply with this policy.
 - Campus President or designee will determine when weather conditions justify cancellation of classes and/or closing of school.
 - Faculty and staff will be notified at school or home that Institute will be closed because of a hurricane.
 - Faculty will notify students in his/her classes about a closing of the school.
 - Shut down all equipment properly; disconnect power sources to the equipment.
 - Signs regarding the closing will be posted.
 - Building Coordinator will secure the building,
 - Post closing information on Student and Faculty Portal.

In most cases a meeting of the Emergency Response Team will not be necessary. Situations in which a meeting may be called include:

- Continuing inclement weather that has necessitated a major change in the academic schedule.
- An injury or death has occurred on campus that was weather-related.
- Damage to the facility that was caused by the severe weather.

Flood

Flood Procedures

When a flash flood **watch** has been issued for the campus area:

- Tune radio, computer, tablet, or cell phone to one of the Emergency Alert stations or applications. Sign up for weather alerts in your area.
- School personnel will assist in providing information on local conditions.
- Be alert for signs of flash flooding and be prepared to evacuate immediately.

When a flash flood **warning** has been issued for the campus area:

- Campus occupants will be notified of the evacuation by the Emergency Response Team.
- If there is advance warning of a flood, then the school may take certain precautions to secure computer equipment and move equipment and business records to avoid damage to assets. Also, consider moving vehicles to a safer location.
- All occupants must leave the campus immediately and move to higher ground away from rivers, streams, creeks, and storm drains.

Severe Winter Snowstorm

The National Weather Service refers to winter storms as “deceptive killers” because most deaths are not a direct result of the storms. People are injured or killed in traffic accidents on icy roads or suffer from hypothermia (low body temperature) due to being cold for a long period of time. Winter storms may knock out power as well (See Power Outages section below for the related procedures).

When a severe snowstorm watch or warning has been issued for the campus area, please do the following:

- Tune radio, computer, tablet, or cell phone to one of the Emergency Alert stations or applications. Sign up for weather alerts in your area.
- School personnel will assist in providing information on local conditions. Students in class will be alerted if the school is closing early due to deteriorating weather conditions.
- For weather related campus closings, notification alerts will be sent out notifying students and employees. All students, staff, and faculty must have their e-mail addresses and cell phones automatically enrolled (Please see campus notification section for more details).

Before a storm hits, the CDC recommends the following actions:

Create an emergency car kit that includes:

- Cell phone, portable charger, and extra batteries
- Items to stay warm such as extra hats, coats, mittens, and blankets
- Windshield scraper
- Shovel
- Battery-powered radio with extra batteries
- Flashlight with extra batteries
- Water and snack food
- First aid kit with any necessary medications and a pocketknife
- Tow chains or rope
- Tire chains

- Canned compressed air with sealant for emergency tire repair
- Cat litter or sand to help tires get traction, or road salt to melt ice
- Booster cables with fully charged battery or jumper cables
- Hazard or other reflectors
- Bright colored flag or help signs, emergency distress flag, and/or emergency flares
- Road maps

Get your car ready by doing the following:

- Have maintenance service on your vehicle as often as the manufacturer recommends. In addition, every fall, do the following:
 - Have the radiator system serviced or check the antifreeze level yourself with an antifreeze tester. Add antifreeze as needed.
 - Replace windshield-wiper fluid with a wintertime mixture.
 - Make sure the tires on your car have adequate tread and air pressure. Replace any worn tires and fill low tires with air to the proper pressure recommended for your car (typically between 30-35 psi).
 - Keep the gas tank near full to help avoid ice in the tank and fuel lines.
 - Keep your car in good working order. Be sure to check the following: heater, defroster, brakes, brake fluid, ignition, emergency flashers, exhaust, oil, and battery.

Fire

Should a fire occur, immediately call 9-1-1. You must stay calm to relay the needed information to the dispatcher. If the facility is equipped with an alarm system, immediately activate it. After placing the 9-1-1 call, calmly, but expediently notify senior management at the Campus so that evacuation procedures can continue until all employees are out of the building. Once outside, all employees and students should report to the designated emergency location as indicated on the evacuation maps. The Emergency Response Team will account that all are present. DO NOT re-enter the building for any reason or under any circumstances. Wait for the arrival of the Fire Department. DO NOT try to retrieve personal belongings. Everything that you may have in your desk or purse CAN BE REPLACED!

Students, faculty, and staff are to meet in the area designated on the evacuation map. Faculty must take roll and report anyone missing to the Campus President, Direction of Education, or other designated campus staff serving in an Incident Coordinator and/or Zone Coordinator role.

Fire Response Procedures

If you discover smoke or a fire:

- Get everyone out of harm's way.
- Confine the fire by closing doors as you leave the area.
- Call 9-1-1
- Notify the Campus Emergency Response Team and/or Front Desk Staff
- Provide the following information:
 - Location of fire
 - Size or type of fire
 - Your location

- Attempt to put the fire out with a portable fire extinguisher **ONLY** when:
 - You have been properly trained.
 - The fire is small.
 - You are not alone.
 - A safe escape route is present.
- Go to the pre-determined Evacuation Assembly area as designated on the campus evacuation map.
- Once assembled, help account for occupants and report to the emergency staff if anyone is unaccounted for and possibly still in the building.

If you hear a fire alarm:

- Do not assume the fire alarm is a false alarm.
- Move to the safest exit.
- Close doors as you leave the area.
- Exit the building.
- Proceed to the designated meeting area.
- Wait for further instructions from the Emergency Response Team or the Fire Department.
- If you are working with hazardous equipment, attempt to shut it down unless doing so puts you at risk.

If you are trapped in an office or other area:

- Wedge cloth material along the bottom of the door to keep out smoke.
- Close as many doors as possible.
- Call 9-1-1
- Call or text the Campus Emergency Response Team or Front Desk and notify of your location and situation.
- Escape through a window, if necessary, by breaking the glass.

Power Outage Procedures

Campus response to a power outage will depend on the circumstances. Information should be obtained from the Emergency Response Team as to the extent and likely duration of the outage. In many cases, the duration is indeterminable, and the following actions are recommended:

1. Stay calm. Information may be provided by the Emergency Response Team to assist answering questions and safe evacuation (if necessary).
2. Help people in darkened areas to move to safety.
3. If it is necessary to evacuate the building, gather personal belongings (if possible).
4. Move toward emergency lighting that highlights emergency exit locations.
5. Exit the school and travel to the prearranged 'assembly' location.
6. Shut down any equipment that could be hazardous if the power suddenly comes back on.

Property Damage or Injuries

In case of property damage or injuries stemming from any severe weather, the Campus President or designee on the Emergency Response Team should contact the Education Affiliates Corporate Office, including the corporate Vice Presidents in charge of facilities and insurance. The Emergency Response Team should document in writing what happened using the Education Affiliates **Accident Report** (available on the EA SharePoint site in the Human Resources & Benefits, Workers Compensation Claims folders; a copy is in this Plan as **Appendix 3**). An assessment of damage to the building, furniture and fixtures, and equipment should be undertaken. Photos should be taken of the damage and damaged property should be preserved, if possible. The landlord should be notified immediately and remediation of damage to building should begin quickly.

Violence

Purpose

It is the purpose of the Emergency Preparedness Plan to promote a positive school climate; to train faculty and staff to identify warning signs of violence and risk; and to train students to report concerns of potential violence.

Violence in a school can be triggered by several things: stress at work, stress at home, disgruntled boyfriend, girlfriend, ex-partners, ex-spouses, disgruntled ex-employees, etc. Though the possibility of a violent attack from an employee or outsider seems remote, immediate action is required if it should occur.

Policy

The following policy elements are in effect:

- Federal law states that all persons have the right to bear arms; however, this law does not apply to school facilities or school grounds. If it becomes evident that you are in possession of a weapon, you will be asked by management to leave the premises until the time that the weapon is discarded.
- All employees are required to report threats to a member of the Emergency Response Team or immediate supervisor. This should also be reported immediately to the Education Affiliates (EA) Hotline at 1-Employees.
- Students or employees who resort to violence often give multiple clues beforehand such as: exhibiting threatening, intimidating or harassing behavior; exhibiting bizarre beliefs, paranoia or an exaggerated sense of entitlement; being obsessed with weapons; showing approval of other incidences of violence; or becoming obsessively involved with work to the point of alienating others. Management should be notified immediately if any employee or student exhibits any of these behaviors.
- Once notified, management will take necessary steps to assess the situation. If deemed necessary, the facility will be evacuated, and proper authorities informed of the situation.
- If a violent incident should occur spontaneously, the appropriate response needs to be evaluated quickly and it may include approaches such as all personnel being evacuated from the building using the nearest exit possible or in the event of an active shooter situation, a lockdown. Senior management will be responsible for contacting local authorities and medical services.

Warning Signs

It must be stressed that if you have had contact with ANY INDIVIDUAL(S) who display the following tendencies, notify the Campus President or Director of Education in your school:

- Threatens harm or talks about killing others.
- Talks about committing suicide.
- Constantly starts or participates in fights.
- Loses temper and self-control easily.
- Possesses or draws artwork that depicts graphic images of death or violence.

- Talks about committing domestic violence.
- Becomes frustrated easily and converts frustration into uncontrollable physical violence.

Intruder/Active Shooter Emergency Action Plan

When a hostile person(s) is actively causing deadly harm or the imminent threat of deadly harm or is barricaded within a building, the following procedures should be followed:

General Procedures:

- Lock yourself in the room you are in at the time of the threatening activity.
- If possible, call **9-1-1** or other appropriate emergency numbers such as the front desk or a member of the Emergency Response Team.
- Do not stay in open areas.
- Lock the window, door(s), and close blinds or curtains.
- Stay away from windows.
- Turn all lights and audio equipment off.
- Try to stay calm and be as quiet as possible.
- If for some reason you are caught in an open area, such as a hallway or main area, you must decide what action to take.
- You can try to hide, but make sure it is a well-hidden space or you may be found as the intruder moves through the building looking for potential victims.
- If you think you can safely make it out of the building by running, do so. If you decide to run, do not run in a straight line. Keep any objects you can between you and the hostile person(s) while in the building or outside the building. When away from the immediate area of danger, summon help any way you can and warn others.
- If the person(s) is causing death or serious physical injury to others and you are unable to run or hide, you may choose to play dead if other victims are around you.
- The last option you have, if caught in an open area, may be to fight back. This is dangerous, but depending on your situation, this could be an option.
- If you are caught by the intruder and are not going to fight back, follow their directions and do not look the intruder in the eyes.
- Once law enforcement arrives, obey all commands. This may involve your being handcuffed or made to put your hands in the air or over your face. This is done for safety reasons, and once circumstances are evaluated by law enforcement, they will give you further directions to follow.

If the shooter is outside the building:

- Proceed to a room that can be locked. Turn off all the lights. Close and lock all windows and doors.
- Get all occupants on the floor and out of the line of gunfire. Also, ensure that no one is visible from outside the room.
- One person in the room should call **9-1-1** and advise the **9-1-1** operator of the situation, including location.

- Unfamiliar voices may belong to the shooter who is attempting to lure victims from their safe space; do not respond to any voice commands until you can verify with certainty that they are being issued by a police officer.
- Remain in place until law enforcement, emergency management and/or school officials give an “All-Clear” notification.

If the shooter is inside the building:

- Lock the room if possible, or if you can, safely leave the building.
- If your room cannot be locked, determine if there is a nearby location that can be reached safely and locked.
- Lie on the floor or under a desk and remain silent.
- If it is possible to escape the area safely and avoid danger, do so by the nearest exit or window. Leave books, backpacks, purses, etc. in the room. As you exit the building, keep your hands above your head and listen for instructions that may be given by police officers on the outside. If you receive no instructions, proceed to an evacuation assembly point that is out of the danger area.
- Contact **9-1-1**. Report your name and location.
- Remain calm, keep your hands up above your head and follow instructions. If an officer points a firearm at you, please try to remain calm. Make no movement that may cause the officer to mistake your actions for a threat. Remember, the officer does not know if you are involved in the incident or are a suspect at this point.
- If you witness anything, tell the responding officers as much about what you know about the situation.
- Wait for law enforcement to come find you.

If the shooter(s) enter your classroom or office:

- Call **9-1-1** if possible and alert the **9-1-1** operator to the shooter’s location. If you cannot speak, leave the phone open so the dispatcher can listen to what is taking place.
- If there is no opportunity for escape or hiding, it might be possible to negotiate with the shooter. After all other options have been exhausted, and as a very last resort, attempt to overcome the shooter with force if necessary.
- If the shooter leaves your area and you can escape, proceed immediately to a safer place. Do not touch anything that is in the vicinity of the shooter.

Bomb Threats/Explosions

Once notification has been received that there is a possibility of or threat of a bomb in the building, ALL occupants of the building including staff, faculty, students, and visitors must evacuate the building IMMEDIATELY. If the facility is equipped with an alarm system, immediately activate it. Supervisors are responsible for assuring the safety of their staff, faculty, students and visitors. Once ALL occupants of the facility have been evacuated and met outside at the designated location, senior management at the Campus will investigate the situation with local authorities and report back to the employees and students. Under no circumstances are employees to attempt to find out details on their own. The local authorities will be busy controlling the situation.

If you should see a package that is "out of place" or seems suspicious in any way, notify a member of the Emergency Response Team. After a quick investigation with employees, senior management will contact the local authorities, if deemed necessary. **DO NOT ATTEMPT TO TOUCH OR MOVE THE PACKAGE!** Evacuation proceedings should start immediately.

If a bomb should detonate, or if there is any other type of explosion, injury to personnel is very likely. If you are injured, but able to walk, please leave the area immediately. If you are not injured and the area appears stable, check for others that may have been injured. If someone is injured, follow these steps:

- **DO NOT move the person.** There could possibly be injuries to the spinal cord that would be aggravated if the person were moved.
- If there is bleeding; apply steady pressure with a cloth. If a cloth is not available, use your hands. DO NOT apply a tourniquet.
- Assure the injured that help is coming and try to keep him/her as calm as possible.
- If the person stops breathing, check the neck area to see if there is a pulse. If no pulse is evident, administer CPR.
- If the injured stops breathing, but has a pulse, check to see if his/her airway is blocked. Loosen their clothing around the neck to help them breathe easier.

Only if someone stops breathing or is in danger (from fire, etc.) should you attempt to move them in any way. Once emergency personnel arrive, leave the building immediately. As stated above, all employees and students should meet outside at the designated location so that a "head count" can be done.

See **Appendix 1: Threats** for the checklist that should be completed if a threat is received.

Evacuation Procedures

In the event of an emergency that requires the evacuation of the premises, an announcement will be made by the Campus President or designee. This is the signal for all employees and students to evacuate the school building. All individuals without emergency assignments will remain outside the building until authorized to re-enter the building by the Emergency Response Team personnel.

Each room will have a floor plan of the school posted near the entrance to the room. The evacuation route and the nearest emergency exit shall be highlighted on the floor plan. All employees should familiarize themselves with the evacuation routes, emergency exits, and designated meeting places. Students will be advised about the existence of the floor plan and will be asked to familiarize themselves with the information in the event of an emergency.

Faculty shall be responsible for the safe evacuation of classrooms. Supervisors shall be responsible for the safe evacuation of their work area(s). All employees and students will be directed to the nearest safe exit from the school and the building. Before leaving the school and the building, Zone Coordinators, with back up from members of the Emergency Response Team, shall ensure that:

- Rooms are evacuated in a calm and orderly manner.
- All the windows are shut.
- All electrical equipment is turned off.
- All students/employees are evacuated through the nearest emergency exit; and
- All classroom/office doors are closed but unlocked.

Once outside, the faculty/supervisors shall ensure that all students/employees are safely outside the building and that all are in an organized manner in a staging area a safe distance from the emergency and clear of the route and access ways for emergency vehicles. Faculty should bring attendance binders to perform roll call outside the building. Report missing students/employees to the Zone Coordinator or Emergency Response Team. Faculty will maintain calm and order and will not allow anyone to leave the premises except to receive medical attention.

Evacuation Areas

The designated assembly areas for the school should be the farthest points from the school and building within or in an outside area.

Persons with Disabilities Evacuation Procedures

If immediate evacuation is necessary, be aware of the following considerations:

Non-Ambulatory Persons

- Wheelchairs have many moving parts; some are not designed to withstand stress or lifting.
- You may need to remove the chair batteries. Life support equipment may be attached.
- In a life-threatening emergency it may be necessary to remove an individual from their wheelchair. Lifting a person with minimal ability to move may be dangerous.
- If necessary, two or three individuals may carry non-ambulatory persons from the building.
- Wheelchairs should not be used to descend stairwells, if possible.

- Non-ambulatory persons may have respiratory complications. Remove them from smoke or fumes immediately and determine their needs and preferences.
- Ways of being removed from the wheelchair:
 - Whether to extend or move extremities when lifting because of pain, catheter leg bags, spasticity, braces, etc.
 - Whether to carry forward or backward on a flight of stairs.
 - Whether a seat cushion or pad should be brought along if the wheelchair is being left behind.
 - In lieu of a wheelchair, does the person prefer a stretcher, chair with cushion/aid, or car seat?
 - Is paramedic assistance necessary?
 - Always consult with the person in the chair regarding how best to assist them.

Visually Impaired Persons

Most visually impaired individuals will be familiar with their immediate surroundings. In an emergency:

- Describe the nature of the emergency and offer to act as a “sighted guide” and offer your elbow and escort him/her to a safe place.
- As you walk, describe where you are and advise of any obstacles.
- When you have reached safety, orient the person as to where you are and ask if further assistance is needed.

Hearing Impaired Persons

Because individuals with impaired hearing may not perceive emergency alarms, an alternative warning technique is required. Two methods of warning:

- Write a note describing the emergency and the nearest evacuation route (“Fire. Go out rear door to the right and down, NOW!”).
- Turn the light switch off and on to gain attention then, indicate through gestures what is happening and what to do.

Lockdown Procedures

Purpose

Used when there is a threat of violence or serious incident that could jeopardize the safety of students/employees (I.E. Intruder, shooting, hostage incident, gang fights, civil disturbance, etc.)

Campus President or Director of Education

- Designate someone to Call **9-1-1**, identify the name and address of the school, describe the emergency, state the school is locking down, provide intruder description and weapon(s) if known, and identify the location of the school command post. Direct staff to stay on the phone to provide updates and additional information.
- The school's Emergency Notification System will be enacted to alert everyone of imminent threat(s).

Office Staff

- Stay by phones to wait for additional procedures from the Campus President, designee, or police.
- Assist the Emergency Response Team to establish the school command post.

Faculty

- Clear the hallway and bathrooms by your room and move everyone into the classroom.
- Lock your doors, turn off your lights, and shut your blinds and windows.
- Move students and staff away from the doors and windows.
- Have everyone sit down against a wall that has the least visibility from outside the room.
- **Place a GREEN or RED status card on/under your door and window. (Green signifies everything is ok, Red means emergency assistance is need)**
- Ignore all bells and alarms unless otherwise instructed.
- Take attendance and be prepared to notify the Emergency Response Team of missing students or additional students, employees or guests sheltered in your classroom.
- Allow no one outside of the classroom until the Campus President or law enforcement gives the **"All Clear"** signal*.
- If outside, faculty will move students to the designated off-campus assembly area and wait for further instructions.

*Consider using a **"Duress Code"** to authenticate any **"All Clear"** signal (This is a specific word or phrase that is used prior to giving the **"All Clear"** signal that indicates to all staff that the person signaling the **"All Clear"** notification is not being forced to do so by an intruder)

Police Emergency Procedures

In case of a police emergency, students and employees should not expose themselves to any unnecessary risks. In the event of an emergency, notify a member of the Emergency Response Team immediately. *To do this, please contact the Front Desk Staff.* If deemed necessary, call the police (**9-1-1**) first and then report the emergency to a member of the Emergency Response Team.

Police emergencies include:

- intruders and/or trespassers
- assaults or threatened assaults
- stalkers
- robberies
- weapons possession
- intoxication
- illegal drugs
- disruptive, illegal, or suspicious behavior
- bombs possession

If the local police are called, the police have the authority over the situation. If the police are not called, a member of the Emergency Response Team should resolve the situation in a manner that minimizes any threat to students or employees.

Exposure Control Plan

Fortis Institute is committed to providing a safe and healthy work environment for the entire staff. In pursuit of this goal, an Exposure Control Plan may be provided as a separate document to eliminate or minimize occupational exposure to bloodborne pathogens in accordance with OSHA standard 29 *CFR* 1910.1030, "Occupational Exposure to Bloodborne Pathogens."

The Institute adheres to the guidance contained in the OSHA Manual available at the following link: <https://www.osha.gov/sites/default/files/publications/OSHA3404laboratory-safety-guidance.pdf>

The Exposure Control Plan is a key document to assist Fortis Institute in implementing and ensuring compliance with the standard, thereby protecting our employees. All Campuses should maintain an **Exposure Control Plan** that as a separate document outlines the following:

- Determination of employee exposure
- Implementation of various methods of exposure control, including:
 - Universal precautions
 - Engineering and work practice controls
 - Personal protective equipment (PPE)
 - Housekeeping
- Hepatitis B vaccination
- Post-exposure evaluation and follow-up
- Communication of hazards to employees and training
- Recordkeeping
- Procedures for evaluating circumstances surrounding exposure incidents
- OSHA assistance and training

Implementation methods for these elements of the standard are discussed in the Exposure Control Plan.

It is recommended that a 'Radiation Exposure Plan' be created for a campus that offers programs with energized labs such as Dental Assisting.

Employees

It is recommended that employees covered by the bloodborne pathogens standard receive an explanation of this during their initial training session. It will also be reviewed during their refresher training. All employees can review this plan at any time during their work shifts by contacting the Exposure Control Plan Coordinator or their supervisor or viewing it in the Learning Resource Center. If requested, a copy of the Exposure Control Plan will be provided to the employee within a reasonable period.

Students

The Exposure Control Plan, universal precautions, personal protective equipment, bloodborne pathogens, hand washing, CPR, etc. may be covered in introductory courses such as AHP101 or the New Student Orientation.

Hazardous Materials/Communication Procedures

The Management of Fortis Institute is committed to preventing accidents and ensuring the safety and health of our students and employees. We will comply with all applicable federal and state health and safety rules. Under this program employees are informed of the contents of the OSHA Hazard Communications Standard, the hazardous properties of chemicals with which they work, safe handling procedures and measures to take to protect themselves from these chemicals. These chemicals may be physical or health related.

Identifying Hazardous Chemicals

Safety Data Sheets (SDS) include information regarding chemicals on campus. Detailed information about the physical, health, and other hazards of each chemical is included in a Safety Data Sheet (SDS); the product identifier for each chemical on the list matches and can be easily cross-referenced with the product identifier on its label and on its Safety Data Sheet. Someone on campus should be designated as the person responsible for establishing and monitoring the company SDS program. She/he will ensure that procedures are developed to obtain the necessary SDSs and will review incoming SDSs for new or significant health and safety information. She/he will see that any new information is communicated to affected employees. It is recommended that the procedure below will be followed when an SDS is not received at the time of initial shipment:

- Locate the product and manufacturer from the invoice or order form.
- Locate an SDS online, or request from vendor.
- Add SDS to the binder located in the coordinator's office, skill labs, and LRC.

Copies of SDSs for all hazardous chemicals to which employees are exposed or are potentially exposed will be kept in the SDS Coordinator's office, all skill labs, and the LRC. SDSs will be readily available to all employees during each work shift. If an SDS is not available, contact the SDS Coordinator, the Program Director, the Director of Education or the Dean of Nursing.

It is recommended that a list be prepared that identifies all hazardous chemicals with a potential for employee exposure at this workplace.

Identifying Containers of Hazardous Chemicals

The labeling system to be used by Fortis Institute will follow the requirements in the 2012 revision of the OSHA Hazard Communication Standard to be consistent with the United Nations Globally Harmonized System (GHS) of Classification of Labeling of Chemicals. The label on the chemical is intended to convey information about the hazards posed by the chemical through standardized label elements, including symbols, signal words and hazard statements.

All hazardous chemical containers used at this workplace should have:

- The original manufacturer's label that includes a product identifier, an appropriate signal word, hazard statement(s), pictogram(s), precautionary statement(s) and the name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.
- A label with the appropriate label elements just described.

- Workplace labeling that includes the product identifier and words, pictures, symbols, or combination that provides at least general information regarding the hazards of the chemicals.
- A designated supervisor will ensure that all containers are appropriately labeled. No container will be released for use until this information is verified. Workplace labels must be legible and in English.

Small quantities intended for immediate use may be placed in a container without a label, provided that the individual keeps it in their possession at all times and the product is used up during the work shift or properly disposed of at the end of the workday. However, the container should be marked with its contents.

Keeping Safety Data Sheets (previously known as Material Safety Data Sheets)

The manufacturer or importer of a chemical is required by OSHA to develop a Safety Data Sheet (SDS) that contains specific, detailed information about the chemical's hazard using a specified format. The distributor or supplier of the chemical is required to provide this SDS to the purchaser.

SDSs are readily available to all employees during their work shifts. Employees can review SDSs for all hazardous chemicals used at this workplace. The SDSs specific to each department are available in the lab and are centrally located for all departments in the Director of Education's or the Campus President's Office. The Dean of Nursing may also maintain a copy of the SDSs for the Nursing program.

The SDSs are updated and managed by the designated supervisor. If a SDS is not immediately available for a hazardous chemical, employees can obtain the required information by contacting the Program Director, the Director of Education, the Dean of Nursing or the Campus President who will either supply this information or will contact the authorized employee who has the required information or take other action(s) to obtain this information.

Training Employees about Chemical Hazards

Before they start their jobs or are exposed to new hazardous chemicals, it is recommended that employees who have a potential risk should attend a hazard communication training that covers the following topics:

- An overview of the requirements in OSHA's Hazard Communication Standard.
- Hazardous chemicals are present in their workplace.
- Any operations in their work area where hazardous chemicals are used.
- The location of the written hazard communication plan and where it may be reviewed.
- How to understand and use the information on labels and in Safety Data Sheets.
- Physical and health hazards of the chemicals in their work areas.
- Methods used to detect the presence or release of hazardous chemicals in the work area.
- Steps that staff have taken to prevent or reduce exposure to these chemicals.
- How employees can protect themselves from exposure to these hazardous chemicals through use of engineering controls/work practices and personal protective equipment.

An explanation of any special labeling present in the workplace:

- What are pictograms?

- What are the signal words?
- What are the hazard statements?
- What are the precautionary statements?

Emergency procedures to follow if an employee is exposed to these chemicals:

A designated supervisor is responsible for ensuring that employees receive training regarding the emergency procedures to follow if exposed to certain chemicals, and that those are incorporated into the school's Hazard Communication Plan.

Prior to introducing a new chemical hazard into any department, each employee in that department should be given information and training as outlined above for the new chemical hazard.

Informing Employees who do Special Tasks

Before employees perform special (non-routine) tasks that may expose them to hazardous chemicals, it is recommended that their supervisors inform them about the chemicals' hazards. Their supervisors should also inform them about how to control exposure and what to do in an emergency. The employer will evaluate the hazards of these tasks and provide appropriate controls including Personal Protective Equipment and all additional training as required.

Informing contractors and other employers about our hazardous chemicals

If employees of other employer(s) may be exposed to hazardous chemicals at our workplace (for example, employees of a construction contractor working on-site), it is the responsibility of the designated supervisor to provide contractors and their employees with the following information:










- The identity of the chemicals, how to review our Safety Data Sheets, and an explanation of the container labeling system.
- Safe work practices to prevent exposure.

Small/Non-Hazardous Spill

Spills that do not endanger occupants in the immediate area may be cleaned up by staff that have been trained and are properly equipped to handle the type of spill. Consideration should be given to the following:

- Chemical involved.
- Amount of chemical spilled.
- Location of the spill.
- Availability of clean-up materials.
- Another type of emergency is noxious fumes or a bothersome smell. Sometimes this is from exposure to a chemical.
 - a. If toxic fumes are present, secure the area (with caution tapes or cones) to prevent other personnel from entering and leaving the area. Avoid breathing in fumes.
 - b. Employees exposed to fumes should seek medical treatment if necessary. The Emergency Response Team and landlord should be notified of fumes and appropriate remediation undertaken.

Hazardous Communication Standard Pictograms and Hazards

 <ul style="list-style-type: none"> ▪ Carcinogen ▪ Mutagenicity ▪ Reproductive Toxicity ▪ Respiratory Sensitizer ▪ Target Organ Toxicity ▪ Aspiration Toxicity 	 <ul style="list-style-type: none"> ▪ Flammables ▪ Pyrophorics ▪ Self-Heating ▪ Emits Flammable Gas ▪ Self-Reactives ▪ Organic Peroxides 	 <ul style="list-style-type: none"> ▪ Irritant (skin and eye) ▪ Skin Sensitizer ▪ Acute Toxicity ▪ Narcotic Effects ▪ Respiratory Tract Irritant ▪ Hazardous to Ozone Layer (Non-Mandatory)
<p style="text-align: center;">Gas Cylinder</p>  <ul style="list-style-type: none"> ▪ Gases Under Pressure 	<p style="text-align: center;">Corrosion</p>  <ul style="list-style-type: none"> ▪ Skin Corrosion/Burns ▪ Eye Damage ▪ Corrosive to Metals 	<p style="text-align: center;">Exploding Bomb</p>  <ul style="list-style-type: none"> ▪ Explosives ▪ Self-Reactives ▪ Organic Peroxides
<p style="text-align: center;">Flame Over Circle</p>  <ul style="list-style-type: none"> ▪ Oxidizers 	<p style="text-align: center;">Environment (Non-Mandatory)</p>  <ul style="list-style-type: none"> ▪ Aquatic Toxicity 	<p style="text-align: center;">Skull and Crossbones</p>  <ul style="list-style-type: none"> ▪ Acute Toxicity (Fatal or Toxic)

Pandemic Plan

The purpose of this pandemic plan is to protect the health and safety of our students, employees, and their families. The scope of this plan is to cover the most prevalently highly infection illnesses such as Influenza/Pandemic Flu, COVID-19 (coronavirus), MERS, SARS, and Ebola.

Provided below is a limited list and explanation of certain infectious diseases. There are many other highly infectious illnesses and diseases that could be listed here but are not due to space limitations. Please visit the Centers for Disease Control and Prevention website (<https://www.cdc.gov/>) for a complete list. Please also see **Appendix 12** for the institution's and the owner organization, Education Affiliates' comprehensive **Pandemic Plan**.

Influenza/Pandemic Influenza - Influenza (flu) is a contagious respiratory illness caused by influenza viruses. It can cause mild to severe illness. Serious outcomes of flu infection can result in hospitalization or death. Some people, such as older people, young children, and people with certain health conditions, are at high risk of serious flu complications. There are two main types of influenza (flu) virus: Types A and B. The influenza A and B viruses that routinely spread in people (human influenza viruses) are responsible for seasonal flu epidemics each year. The best way to prevent flu is by getting vaccinated each year.

An influenza pandemic is a global outbreak. An influenza pandemic is a global outbreak of a new influenza A virus. Pandemics happen when new (novel) influenza A viruses emerge which can infect people easily and spread from person to person in an efficient and sustained way. (Note: COVID-19 was not a flu pandemic, but rather a new strain of the coronavirus).

The difference between the seasonal flu and pandemic flu are described below:

Seasonal Flu	Pandemic Flu
Outbreaks follow predictable seasonal patterns; occurs annually, usually in winter (Dec - Feb), and peaks in temperate climates	Occurs rarely (Three times in 20th century)
Usually some immunity built up from previous exposure	No previous exposure; little or no pre-existing immunity
Healthy adults usually not at risk for serious complications; Certain people are at high-risk for serious complications (infants, elderly, pregnant women, extreme obesity and persons with certain chronic medical conditions)	Healthy people may be at increased risk for serious complications
Health care providers and hospitals can usually meet public and patient needs	Health care providers and hospitals may be overwhelmed Alternate care sites may be available to meet public and patient needs
Vaccine developed based on known flu strains and available for annual flu season	Although the US government maintains a limited stockpile of pandemic vaccine, vaccine may not be available in the early stages of a pandemic. Most likely no vaccine exists in the early stages. Two doses of vaccine may be needed
Adequate supplies of antiviral medications are usually available	Effective antiviral medications may be in limited supply
Rates of medical visits, complications, hospitalizations and death can vary from low to high. CDC estimates that flu-related hospitalizations since 2010 ranged from 140,000 to 710,000, while flu-related deaths are estimated to have ranged from 12,000 to 56,000.	Rates of medical visits, complications, hospitalizations and death can range from moderate to high Number of deaths could be much higher than seasonal flu (e.g. The estimated U.S. death toll during the 1918 pandemic was approximately 675,000)
Symptoms: fever, cough, runny nose, muscle pain. Deaths often caused by complications, such as pneumonia.	Symptoms may be more severe and complications more frequent
Generally causes modest impact on society (some school closings, encouraging people who are sick to stay home)	May cause major impact on society (widespread restrictions on travel, closings of schools and businesses, cancellation of large public gatherings)
Manageable impact on domestic and world economy	Potential for severe impact on domestic and world economy

COVID-19 (Coronavirus) – People with the COVID-19 virus have had a wide range of symptoms reported – ranging from mild symptoms to severe illness. The virus is spread person-to-person between people within close contact (about 6 feet) via respiratory droplets produced when an infected person sneezes or coughs, and these droplets are inhaled into the lungs of by people who are nearby. (Please see Appendix 12 for complete Pandemic/Influenza plan.)

Symptoms may appear **2-14 days after exposure to the virus**. People with these symptoms may have the COVID-19 coronavirus:

- Fever or chills
- Fatigue
- Sore throat
- Cough
- Shortness of breath or difficulty breathing
- Muscle or body aches
- Headache
- New loss of taste or smell
- Congestion or runny nose
- Nausea or vomiting
- Diarrhea

This list does not include all possible symptoms. As we learn more about this virus, this list may be expanded.

When to Seek Emergency Medical Attention

Look for **emergency warning signs*** for COVID-19. If someone is showing any of these signs, **seek emergency medical care immediately**:

- Trouble breathing
- Persistent pain or pressure in the chest
- New confusion
- Inability to wake or stay awake
- Bluish lips or face

*This list does not include all possible symptoms. Please call your medical provider for any other symptoms that are severe or concerning you.

SARS – Severe acute respiratory syndrome (SARS) is a viral respiratory illness caused by a coronavirus called SARS-associated coronavirus (SARS-CoV). SARS was first reported in Asia in February 2003. The illness spread to more than two dozen countries in North America, South America, Europe, and Asia before the SARS global outbreak of 2003 was contained. Since 2004, there have not been any known cases of SARS reported anywhere in the world.

MERS - MERS-CoV, like other coronaviruses, likely spreads from an infected person's respiratory secretions, such as through coughing. However, we do not fully understand the precise ways that it spreads.

MERS-CoV has spread from ill people to others through close contact, such as caring for or living with an infected person. Infected people have spread MERS-CoV to others in healthcare settings, such as hospitals. Researchers studying MERS have not seen any ongoing spreading of MERS-CoV in the community.

All reported cases have been linked to countries in and near the Arabian Peninsula. Most infected people either lived in the Arabian Peninsula or recently traveled from the Arabian Peninsula before they became ill. A few people have gotten MERS after having close contact with an infected person who had recently traveled from the Arabian Peninsula. The largest known outbreak of MERS outside the Arabian Peninsula occurred in the Republic of Korea in 2015 and was associated with a traveler returning from the Arabian Peninsula.

Public health agencies continue to investigate clusters of cases in several countries to better understand how MERS-CoV spreads from person to person.

Ebola – Ebola virus disease (EVD) is a deadly disease with occasional outbreaks that occur primarily on the African continent. EVD most commonly affects people and nonhuman primates (such as monkeys, gorillas, and chimpanzees). It is caused by an infection with a group of viruses within the genus Ebolavirus. The virus usually starts between 2 days and 3 weeks after contracting the virus. Symptoms show up as a fever, sore throat, muscular pain, and headaches. Vomiting, diarrhea, and a rash may follow along with decreased function of the liver and kidneys. An infected person may bleed both internally and externally and has a very high risk of death, killing between 25-90% of those infected. Death often occurs from low blood pressure due to loss of blood. The virus spreads to people initially through direct contact with the blood, body fluids and

tissues of animals. Ebola virus then spreads to other people through direct contact with body fluids of a person who is sick with or has died from EVD. This can occur when a person touches these infected body fluids (or objects that are contaminated with them), and the virus gets in through broken skin or mucous membranes in the eyes, nose, or mouth. People can get the virus through sexual contact with someone who is sick with EVD, and after recovery from EVD. The virus can persist in certain body fluids, like semen, after recovery from the illness.

Measles – Per the Centers for Disease Control and Prevention (CDC):

Measles was [officially eliminated from the United States in 2000](#), meaning measles doesn't continuously spread within the country for more than 12 months at a time and new cases are only found when someone contracts measles abroad and returns to the country. Achieving measles elimination status in the U.S. was a historic public health achievement. Elimination is defined as the absence of endemic measles transmission in a region for ≥ 12 months in the presence of a well-performing surveillance system.

The Measles, Mumps, Rubella (MMR) vaccine is very safe and effective. When more than 95% of people in a community are vaccinated (coverage $>95\%$), most people are protected through community immunity (herd immunity). At local levels, vaccine coverage rates may vary considerably, and pockets of unvaccinated people can exist in states with high vaccination coverage. When measles gets into communities of unvaccinated people in the U.S., outbreaks can occur.

For additional information: <https://www.cdc.gov/measles/cases-outbreaks.html>

INFECTION DISEASE PREVENTION: PREPARE-PREVENT-PROTECT

Preparedness refers to those actions and measures taken before an event to better handle the emergency when it arises. The CDC plays a prevalent role in making sure states and local health departments are prepared for public health emergencies. During any pandemic or infectious disease outbreak, our institution will be working closely with state and local health officials to ensure the safety of our students and employees.

In the early phases of a pandemic or outbreak, the CDC recommends following good health habits to help mitigate the risk of infection and to help reduce the spread of infection. These good habits include:

- Avoid close contact.
- Stay home when you are sick.
- Cover your mouth and nose.
- Clean your hands. Hand sanitizers can be effective when there is no access to water.
- Avoid touching your eyes, nose, or mouth.
- Practice other good health habits (i.e., clean and disinfect surfaces, practice social distancing, etc.)

Everyday preventative actions, like non-pharmaceutical interventions (NPIs), are actions, apart from getting vaccinated or taking medicine that people and communities can take to help slow the spread of illness like influenza (flu).

In the Event of a Pandemic, Infectious Disease Outbreak or Other Type of Emergency

The Campus President, along with other members of Fortis Institute Leadership Team and Education Affiliates Senior Management, will work closely with state and local public health officials, along with any other local authorities, to decide the best course of action for executing public health infection control measures or other types of emergencies or unanticipated interruptions including weather related natural disaster events such as tornados, severe lightning, thunder, hail and snow storms, hurricanes, flash floods, fires, and campus facility maintenance issues such as extensive property damage, electric power outages impacting heating, cooling and refrigeration, electrical systems, failure of information technology services including internet access, and other unanticipated operations related circumstances including human resources, etc. Other types of emergency scenarios include explosion; hazardous material release; high crime incidents including active shooter and bomb threat; power failure; medical and other geographically contingent variables. This course of action may include cancellation of classes and/or other events, closure of the campus, and a contingency plan for those students who may have externships or clinical studies that may be directly impacted.

Students and employees will be notified via the Emergency Notification System (See Page 43 of this Plan) for details regarding the Emergency Notification System) of any school closures. The campus website and student portal will be a key medium for communicating to students, employees, and the community on the action taken for various safety measures, including the continuity of teaching. The campus e-mail system, along with other campus teaching platforms, will be a common communication platform to inform students of any pertinent information relating to the on-going situation.

Continuity of Student Learning and Operations

To ensure continuity of instruction for unanticipated emergencies or operational interruptions, a modified learning environment may be needed. Campus management, along with senior management, will work closely with federal, state, and accreditation agencies to develop alternative procedures. This may include obtaining the appropriate approvals to provide alternate methods of program delivery. These alternative methods of teaching may include temporary web-based distance instruction along with remote lessons and assignments. The delivery methods may vary by program and may include activation of the following emergency continuity of student learning and operations policy. Please Note: If this (below detailed) policy is activated (pursuant to campus, RVP, and Senior VP of Financial Aid & Compliance approvals), students, faculty and staff will be notified:

1. If a student has contracted the Covid 19 virus, or other contagious infectious illness, or is debilitated as a result of a severe accident or other emergency event, or has experienced severe personal circumstances, the student may participate in synchronous/remote training for the period of required quarantine or recovery process not to exceed 15 calendar days. This allowance assumes that the student is either asymptomatic or mildly affected and can actively participate in class remotely.
 - The synchronous class will be recorded and archived.

- Attendance must be recorded daily
 - Students will submit required work remotely through the Canvas Learning Management System and must do so within the same timeframe as ground-based students
 - An inability to return to class after the 15-day quarantine period will result in the student being dismissed
2. If a student who has contracted the Covid 19 virus or other contagious infectious illness or has experienced severe personal circumstances and is unable to participate as explained above due to a more severe reaction, a covid positive student can quarantine up to 17 calendar days of class instead of the 14-calendar day policy in place for standard non-attendance whereupon a student is dropped. This is to allow for up to a 2-week quarantine period be completed and to provide for a safe return to a ground-based class. Although this gives a student some flexibility, it must be noted that a student may very well fail the class due to time missed. However, they will be allowed to repeat the class, and the student will be in an uninterrupted active status as an accommodation. Failed classes will affect a student's GPA and may affect their Satisfactory Academic Progress status. In programs with maximum failed class policies, this failed class will count as a failed class.
 3. If a student has been exposed to the Covid-19 virus or other contagious infectious illness, the student may participate in class via synchronous training. The above requirements in bullet 1 continue to apply.

To do so the student must take the following actions:

If the student notifies school administration, they are self-quarantining due to exposure to a person who tested positive for COVID and/or exhibits symptoms of COVID or other contagious infectious illness, the student must provide details to the school to justify the need for synchronous training. In most cases, this consideration will be limited to two events. Any further exposure experiences will result in a drop and future re-enter.

Support for Students

Faculty and technology support will be provided to all students and employees. Any student or employee that may need technology hardware and/or software support will be provided with such support through the school's administration. A student may require access to a computer, webcam, and the internet or the ability to receive and access recorded classroom lectures to participate in emergency web-based classes. The school will work tirelessly to ensure students and employees receive the appropriate tools to accommodate any modified learning structure.

Clinical, Practicum, and Externships

School officials will also work closely with the externship and clinical sites to avoid interruption where possible. When interruption is unavoidable, the school will use the following guidelines pending federal, state, and accreditor approval:

- In each event that a clinical or externship experience is impacted due to unavailability of the site, or other restriction due to the emergency situation, we will identify options to move students to sites that are still available and willing to accept students.

- If/when it is not possible to identify an alternate site for a student or class, equivalent clinical simulations will be utilized instead where possible and appropriate.
- If/when it is not possible or appropriate to utilize clinical simulation, equivalent remote laboratory experiences will be utilized instead where possible and appropriate.
- If/when it is not possible or appropriate to utilize remote laboratory experiences, the experience will be rescheduled for the student after classes return to normal, utilizing a 30-day incomplete grade function.

Learning Resources System

Students taking on-line courses on a 'limited and emergency' basis may have access to the Learning Resource System (LRS) that maintains a collection of educational resources via on-line databases through the Library and Information Resources Network (LIRN). The collection currently consists of books, industry publications, and various types of electronic materials. The book collection contains reference materials for each program, as well as general information and literary selections. The LRS maintains access to several scholarly journals.

Extended Absences for Students

A pandemic situation or other community infectious disease situation or other emergency event may cause an unavoidable disruption to instruction. This includes those programs that may not be able to use an alternate mode of instruction and those students who may become ill because of a pandemic or another infectious disease outbreak situation. Based upon federal, state, and accreditation approvals and guidelines, where applicable, the school will consider the granting of leave for those directly affected by a pandemic or other community infectious disease situation or other type of emergency event.

Pandemic/Outbreak/Emergency Policy Disclosure

The policies listed above are solely dependent on federal, state, and accreditation regulations and guidance. Without the appropriate approvals by these agencies, certain modified policies and practices are not permitted by law.

Communication

As noted above, the campus website and student portal will be key media for communicating to students, employees, and the community on the continuing action taken throughout. The campus e-mail system, along with other campus teaching platforms, will be a common communication platform to inform students of any pertinent information relating to the on-going situation.

Returning to Normal Operations

Campus management will work closely with state and local public health officials to determine and assess the readiness to resume normal operations. This analysis will most likely be conducted on a state-by-state basis and even on a county-by-county basis in some instances. Not all localities may be able to resume operations at the same time. The campus will remain in communication with students and employees as described within this plan.

Emergency Response Kit

It is recommended that the Fortis Institute campus maintain an emergency response kit in the main administration area. During an emergency the kit should be taken outside or to the appropriate area to have it on-hand as needed. Also, it is recommended that the Emergency Response Kit contain the following items:

- A copy of the Emergency Preparedness Plan along with a current employee and student roster
- First aid kit
- Flashlights and extra batteries
- AM/FM radio and extra batteries
- Emergency water supply

Maintaining additional first aid kits at the Front Desk and in all the skills laboratories is advised.

As a precautionary measure, it is suggested that all staff, faculty and students maintain a personal emergency kit including one in their vehicles, if applicable.

The American Red Cross website located at <http://www.redcross.org/services/prepare> provides additional information on emergency kits for both work and home.

Medical Emergency Procedures

In case of a medical emergency: **Call 9-1-1**

Be prepared to provide the following information:

- School name
- Address
- Nature of injury
- Location of injured person
- Approximate age and sex of injured person
- Current condition
- Any known medical history
- Notify the Emergency Response Team and/or Front Desk Staff. Remain with the person with the medical emergency. Do not move him/her unless he/she is in immediate danger of further injury.

When an employee or a student is injured a school supervisor should complete the Education Affiliates **Accident Report** (available on the EA SharePoint site in the Human Resources & Benefits, Workers Compensation Claims folders, and in **Appendix 3** of this Plan) and provide a copy to the corporate Vice President of Treasury Operations. Any witnesses to accidents should provide written statements to document what happened. The school must report employee injuries to Education Affiliates Workers Compensation insurer (Travelers Insurance) as Worker Compensation claims. It is important to report claims immediately. (Students are not covered by Workers Compensation except in the state of Colorado.)

Questions concerning insurance for employee and student injuries should be directed to the Education Affiliates Vice President of Treasury Operations.

General Procedures

Invariably questions will arise concerning payroll, whether a crisis occurs at the end of a pay period or if the crisis is for an extended period. Employees will want to know when (how and where if they do not have automatic deposit) they will be paid during any shutdown of the school's operation. Senior management will be responsible for answering these questions.

As educators, we are committed to serving our students. In situations where a crisis or a disaster causes the school to shut down, students, faculty and staff must be notified of the problem and must be kept up to date as to the progress of re-opening the school.

The **Campus President** is responsible to ensure that the message on the answering machine is changed to reflect the situation, if telephone service allows, and contacting insurance carriers if warranted. The **Education Affiliates Corporate Staff** will contact any banking institutions or other agencies, if necessary; to convey the status of the company and needs it may have and will also initiate any correspondence necessary to government agencies to assure that the company's interest is safeguarded.

Alternative resources should also be established for long-term shutdowns to include computer equipment, fax equipment, copiers, telephones, etc. Key personnel will be commissioned, as deemed necessary, to establish these resources as a joint effort in support of the school's mission.

For many disasters, especially in the event of a fire, there will not be time to do anything other than safely evacuate the building. Every employee should be informed of escape and evacuation procedures. There are no "alarm" systems located in the building; therefore, senior management on site will inform students, faculty and staff present in the building of the danger/crisis. Generally, the person responsible for this will be the local Campus President, who will in turn immediately notify the appropriate Education Affiliates corporate employee in White Marsh, MD. Upon notification of a problem, the Campus President will take the necessary steps to inform the employees of actions that would need to be taken. Exit plans should be in each room and area within the building. Each employee should remain calm and proceed to the nearest exit. Once outside the building, all employees and students should report to a designated area (this should be determined and communicated at each location by the Campus President). This will help to ensure that all personnel are out of the building and accounted for. Supervisors should ensure that his/her area is secure and that all personnel have left.

A quick recovery after a disaster is usually critical to the survival of a company, but employees will not be allowed to return to work until a complete safety inspection of all facilities has been performed. When this occurs, each employee must know what his or her immediate job responsibility is. **Supervisors** will need to identify what is essential rather than just beneficial. Try to keep everyone focused on what must be done to return to normal operations in the quickest possible time. Evaluate special requests carefully, and when appropriate, make exceptions to procedures or policies to accommodate special needs. Stress that the action taken is an exception. Each supervisor must remember to provide on-going communications and status reports. This will

go a long way toward improving morale and encouraging a strong team spirit.

Extended shutdown of operations sometimes results from crisis situations. If this should occur, issues will need to be addressed by the **Campus President** such as:

- Employment status of employees.
- Salary and benefits continuation; and
- If only a reduced staff will be used until full-scale operations can be resumed, how to determine whom will return to work immediately and who will be laid off during that time.

Training

Training for an Emergency

- Properly train on the Emergency Preparedness Plan.
- Conduct training exercises regularly.
- Together, the Emergency Preparedness Plan and training exercises prepare the staff and faculty to effectively respond to any emergency and help minimize loss of life.

Employees and Students

- The Emergency Preparedness Plan is discussed as part of new student and new employee orientation.
- The Emergency Preparedness Plan is placed on the school's '**Ignite to Learn**' portal for easy access by the students and faculty.

Recommendations for Training

- IS-907 – Active Shooter: What You Can Do Instructor Guide and Student Manual
<http://training.fema.gov/EMIWEB/IS/IS907.asp>
- Training by local law enforcement officials.
- **Guidelines for OSHA Training and Updating** – see **Appendix 6** for an example.
- Education Affiliates 'LEARN' courses including FAC OD205 OSHA
<https://edaff.sharepoint.com/sites/LEARN>

Training During a Pandemic

Due to the unforeseen circumstance related to a pandemic, most students and faculty are not permitted to visit or attend class on campus or there is very limited activity permitted on campus. Due to these uncertain times and limited activity, training may be suspended due to the Centers for Disease Control and Prevention (CDC) recommendations and social distancing guidelines. As a result, the training exercises may resume within 12 weeks of the school resuming normal operations. This includes employee training, the Emergency Notification Testing for both the students and employees, and any training by local law enforcement (i.e., Active Shooter Training). The delay in training is for the safety of everyone involved. (Please see **Appendix 12** for the comprehensive **Education Affiliates Pandemic Plan**.)

Training Your Staff for an Emergency

- To best prepare your staff for an emergency, create an Emergency Action Plan (EAP), and conduct training exercises regularly.
- Together, the EAP and training exercises will prepare your staff to effectively respond to any emergency and help minimize loss of life.

Any training should be documented.

See **Appendix 7a: Emergency Preparedness Plan Training and Testing Tracking**.

Sample training attendance templates can be found in **Appendices 7b.** and **7c.**

Recovery of Critical Records

If a disaster situation results in the destruction or loss of critical records, the following records recovery procedure should be initiated by the Fortis Institute Leadership Team in consultation with the Education Affiliates corporate staff including the Information Technology and Security Team. For this purpose, critical records are defined as:

- Accounting
- Attendance Rosters
- Student Database Records
- Official Transcripts

In the event of any destruction or loss of critical records (as defined above), school administration shall promptly report such to the Information Technology (IT) and Security Team at the following web link: <https://servicedesk.edaff.com>

The IT and Security Team will respond immediately with the appropriate action to take.

If you can't access the service desk portal use the QR code or link below to submit a help desk request.

<https://forms.office.com/r/QnKBcmmVzs>

FOR EMERGENCY USE ONLY:



Also, you can point your phone camera at the QR Code to open the service desk portal and sign in with Office 365 credentials.

This process is for emergency use only to reset your Education Affiliates Network password or request Duo Activation.

Communication Before, During, and After an Incident

Emergency Notification System

The Emergency Notification System is a means of notifying students and employees of an impending emergency or threat on campus. Currently, Fortis Institute uses a software application called **Ignite to Learn** to notify students and employees of an impending emergency. The main purpose of this application is to serve as a communication portal between students, faculty, and staff.

All students, faculty, and staff have access to this platform utilizing their Microsoft Office 365 account. New students and employees are automatically enrolled during the enrollment and orientation process. The Fortis Institute 'Ignite to Learn' platform also has a mobile phone application that can be downloaded by students, faculty, and staff. The emergency notifications will be sent via e-mail and by a "push" notification through the mobile application (if downloaded on the mobile phone). The emergency push notifications through the mobile application cannot be turned off due to their purpose of notifying students and employees of an imminent threat or emergency.

This mass notification system is only used for critical, timely emergency notifications including weather related campus closings and other significant events. The Campus President or appropriate authorized personnel will notify students, faculty, and staff of such events by sending a message through the notification system. The notification will be sent only to those school e-mail addresses within the notification system. Please note that all students and employees are registered within the 'Ignite to Learn' application via their school assigned email addresses. If students, faculty, and staff have downloaded the application on their mobile phone and are enrolled, those individuals will also receive emergency push notifications via the mobile application. If an emergency event or situation is confirmed with the appropriate parties (i.e., law enforcement, National Weather Service, etc.) and the situation poses an immediate threat to the campus community, the Campus President, along with other members of the Fortis Institute Management Team, will determine the content of the notification.

A test of the Emergency Notification System is conducted annually. A log will be kept within the Emergency Preparedness Plan in **Appendix 7a.** of this Plan notating the date and time of the test. This information is also kept with the Education Affiliates Corporate Compliance Department. A separate electronic record of the notification is stored within the 'Ignite to Learn' application.

Closure/Opening of School

- Each supervisor should have a list readily available of his/her subordinates' phone numbers and addresses. It is the supervisor's responsibility to contact his/her employees with work status updates if evacuation and/or shutdown of the school's operation are necessary.
- The faculty should have a list of students and contact the students when it is feasible of school closure.
- If a TV or radio station is used for closure announcements, this information must be provided to the students during New Student Orientation.
- Place on Student Portal.

Communication Protocol/Media Communication

Crisis communications have a lasting impact on institutional reputation and public support. How well we convey our message to the public greatly depends on what is reported to the news media. This is especially true in a crisis, during which the news media is the primary means of communication to our constituencies. Because of the emotions that usually accompany crises, images formed from crisis reporting are especially important in shaping long-lasting public impressions of the institution. In the event of a major crisis on campus, it is essential that an effective communications plan be put into effect to disseminate timely, accurate information and to ensure that inquiries are routed to the appropriate sources.

The Campus President is responsible for the dissemination of campus related communications in the event of a campus emergency. This includes internal communications with students, faculty, and staff, as well as communications with the media. The priority will be on maintaining timely and open communications with the media, providing complete and accurate information that has been confirmed about the emergency and the school's response to the crisis at hand.

Communications with the media will be frequent throughout the duration of the emergency. The Fortis Institute website and student portal will be utilized as key media for updating our campus community and the public on the details of the emergency and actions we are taking to address all related issues. During a campus emergency faculty, staff and students have a right not to speak with the media. In the event of any media inquiries, faculty, staff, and students should refer the media to the Campus President.

Conclusion

In all the above situations the well-being of employees and students is the top priority. Safety should be the main factor in any crisis, disaster or emergency that might occur. Keeping safety first and foremost and using good judgment will be the prevalent solution to any situation that might arise.

All questions or concerns regarding these procedures/instructions should be directed to the Campus President or to the Education Affiliates senior management at the corporate office in White Marsh, MD.

The subject of emergency planning is one which, by its very nature, changes over time and as best practices evolve. Fortis Institute reserves the right to amend, modify and change this Emergency Preparedness Plan, and will provide notice as practical. In the case of a situation which is continuing, such as a pandemic, this Plan does not restrict or limit the School's ability and right to modify and change its operations and practices, including without limitation those pertaining to hours, schedules, teaching and employment, as such circumstances warrant, as determined by the School.

NOTICE: All such occurrences, as referred above, must be recorded on an Accident Report (Appendix 3), and filed as directed by the Campus President or designee.

See Appendix 3: Accident Report.

Appendices

Appendix 1: Threats

In the event you receive a threat call (i.e., bomb threat, armed assault, custody issues), remain calm; if possible, have a pre-arranged communication signal to alert other personnel to listen to the caller also. If possible, advise the caller or individual on campus who poses a threat that the detonation of a bomb or firearm shots could maim or injure innocent people.

Threat Checklist *(modify based on the nature of the threat)*

Complete this list if you receive a threat.

Exact time of call: _____ Date: _____

Phone Number on the Caller ID:

Exact words of caller or description of the threat incident:

[illegible]

Call received by: _____ Position _____

Date _____ Time _____

Do not hang up! Obtain as much information as possible:

- What action are you taking? _____
- Is there a bomb? _____
- When is the bomb going to explode? _____
- Where is the bomb? _____
- What does it look like? _____
- What kind of bomb is it? _____
- Did you place the bomb? _____

- Why? _____
- Where are you calling from? _____
- What is your address? _____
- What is your name? _____
- Any other information provided by caller _____

Caller's Voice Characteristics (place and "X" in all applicable boxes)

- | | | | | |
|-------------------------------------|----------------------------------|------------------------------------|-----------------------------------|---|
| <input type="checkbox"/> Male | <input type="checkbox"/> Rapid | <input type="checkbox"/> Slurred | <input type="checkbox"/> Distinct | <input type="checkbox"/> Clearing Throat |
| <input type="checkbox"/> Female | <input type="checkbox"/> Slow | <input type="checkbox"/> Raspy | <input type="checkbox"/> Sincere | <input type="checkbox"/> Deep Breathing |
| <input type="checkbox"/> Young | <input type="checkbox"/> Loud | <input type="checkbox"/> Lisp | <input type="checkbox"/> Squeaky | <input type="checkbox"/> Cracking Voice |
| <input type="checkbox"/> Middle Age | <input type="checkbox"/> Normal | <input type="checkbox"/> Broken | <input type="checkbox"/> Excited | <input type="checkbox"/> Accent: Describe _____ |
| <input type="checkbox"/> Old | <input type="checkbox"/> Deep | <input type="checkbox"/> Nasal | <input type="checkbox"/> Laughing | |
| <input type="checkbox"/> Angry | <input type="checkbox"/> Soft | <input type="checkbox"/> Stressed | <input type="checkbox"/> Crying | <input type="checkbox"/> Other: Describe _____ |
| <input type="checkbox"/> Calm | <input type="checkbox"/> Stutter | <input type="checkbox"/> Disguised | <input type="checkbox"/> Giggling | _____ |

Background Noises (place an "X" in all applicable boxes)

- | | | | |
|--|---------------------------------------|----------------------------------|---|
| <input type="checkbox"/> Street Noises | <input type="checkbox"/> House Noises | <input type="checkbox"/> Factory | <input type="checkbox"/> Office |
| <input type="checkbox"/> Traffic | <input type="checkbox"/> Motors | <input type="checkbox"/> Animal | <input type="checkbox"/> Television/Radio |
| <input type="checkbox"/> Vehicle Noise | <input type="checkbox"/> Music | <input type="checkbox"/> Water | <input type="checkbox"/> Voices |
| <input type="checkbox"/> Bar | <input type="checkbox"/> P. A. System | | |
| <input type="checkbox"/> Other: Describe _____ | _____ | _____ | _____ |

Threat Language (place an "X" in all applicable boxes)

- | | | | |
|---|-------------------------------------|-------------------------------------|---------------------------------------|
| <input type="checkbox"/> Well-spoken | <input type="checkbox"/> Foul | <input type="checkbox"/> Incoherent | <input type="checkbox"/> Message read |
| <input type="checkbox"/> Taped | <input type="checkbox"/> Irrational | <input type="checkbox"/> Educated | <input type="checkbox"/> Foreign |
| <input type="checkbox"/> Other: Explain _____ | | | |

Call 911 immediately. Provide the following information:

Identify yourself.

State: I have received a **(bomb or other type of)** threat.

Give school name and address.

REMAIN CALM!

Appendix 2: Floor Plans and Emergency Evacuation Maps

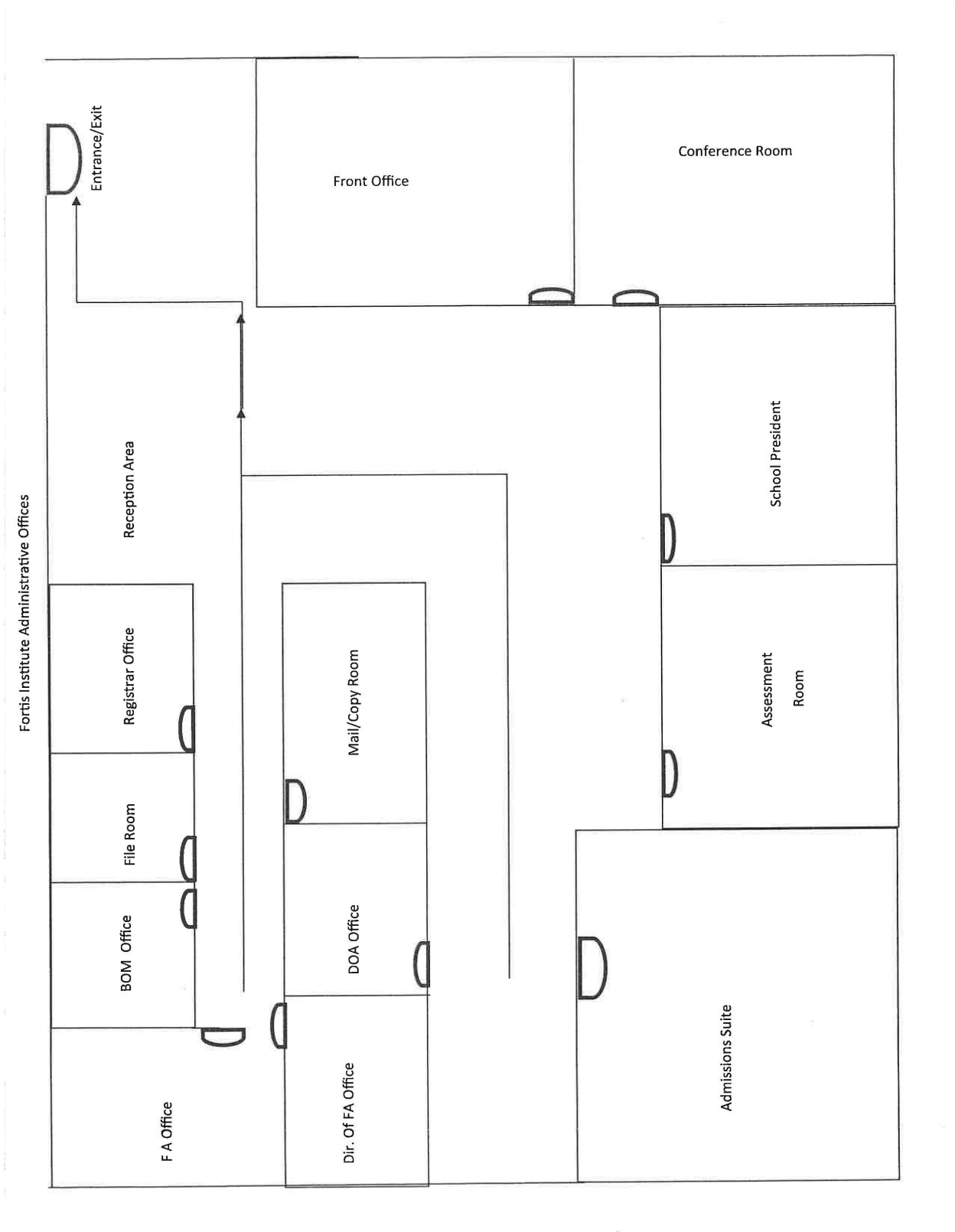
Fortis Institute, Scranton

Note:

An Evacuation Plan Map is conspicuously located in all classrooms and administrative areas of the school. On those maps, there is a highlighted section to correspond to the most direct evacuation route and marked meeting area in the event of an emergency. For any questions regarding the map, please contact the Campus President or the Director of Education.

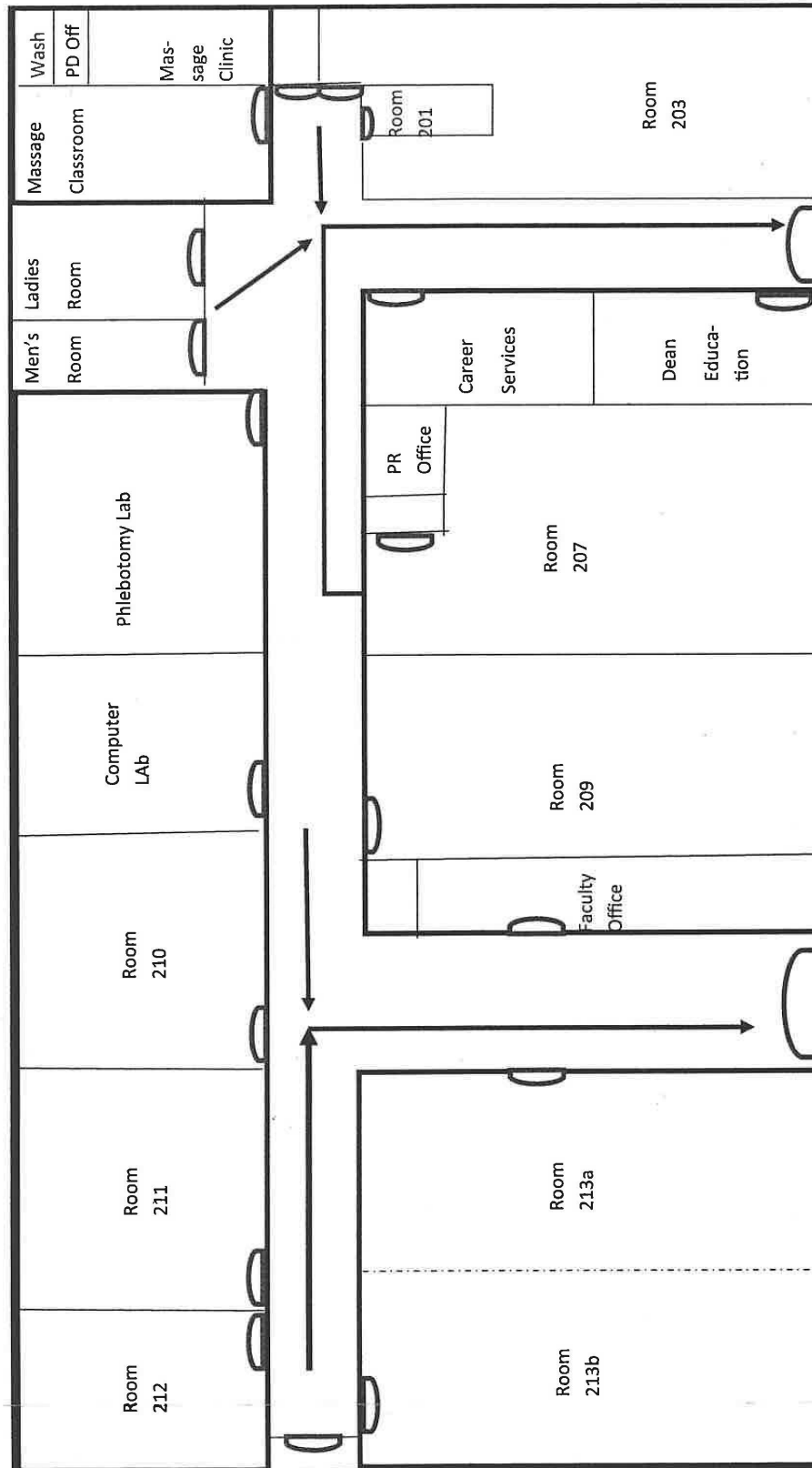
Fortis Institute's Floor Plans and Evacuation Maps are displayed below on Pages 50-53.

Fortis Institute, Scranton Floor Plans and Evacuation Maps #1

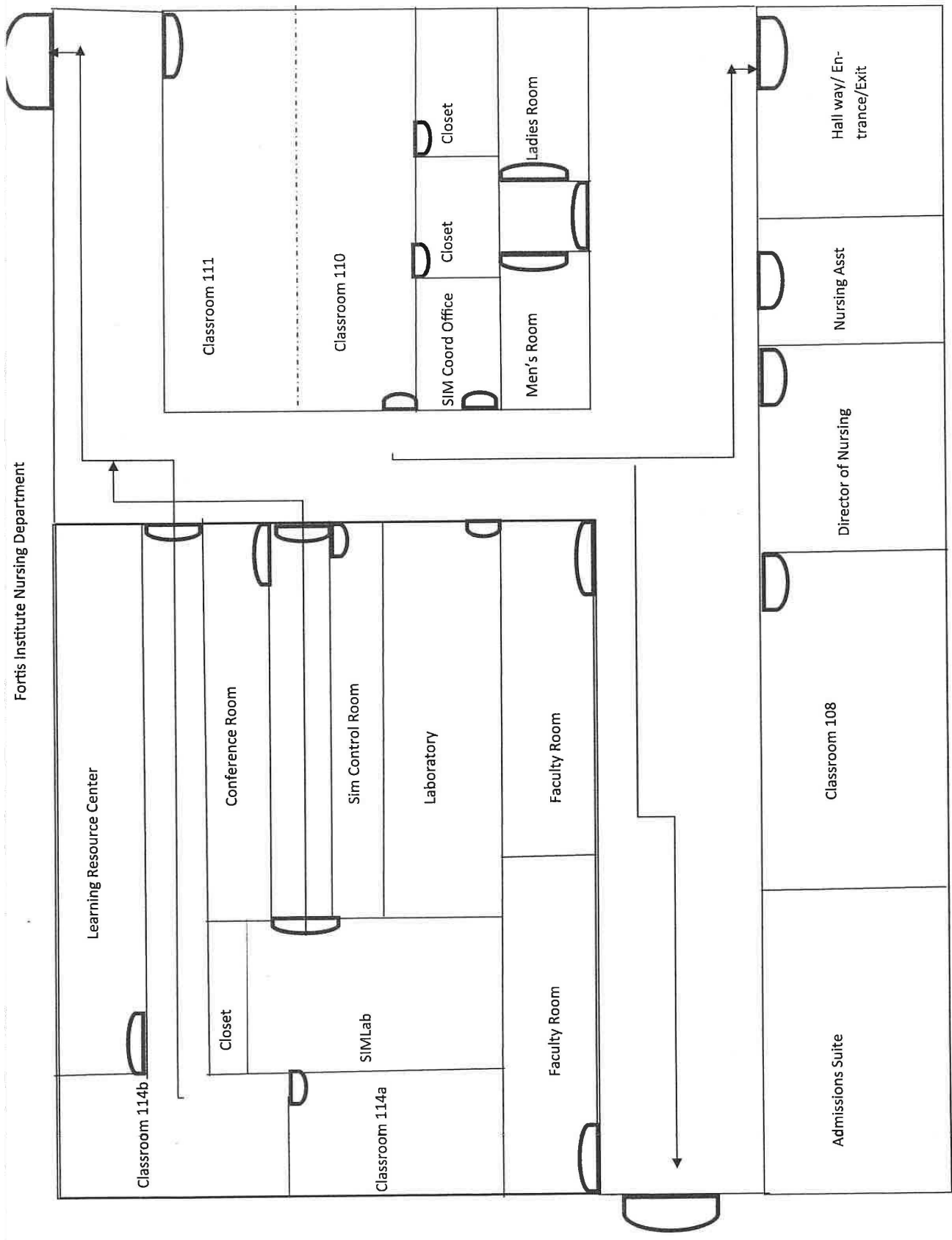


Fortis Institute, Scranton Floor Plans and Evacuation Maps #2

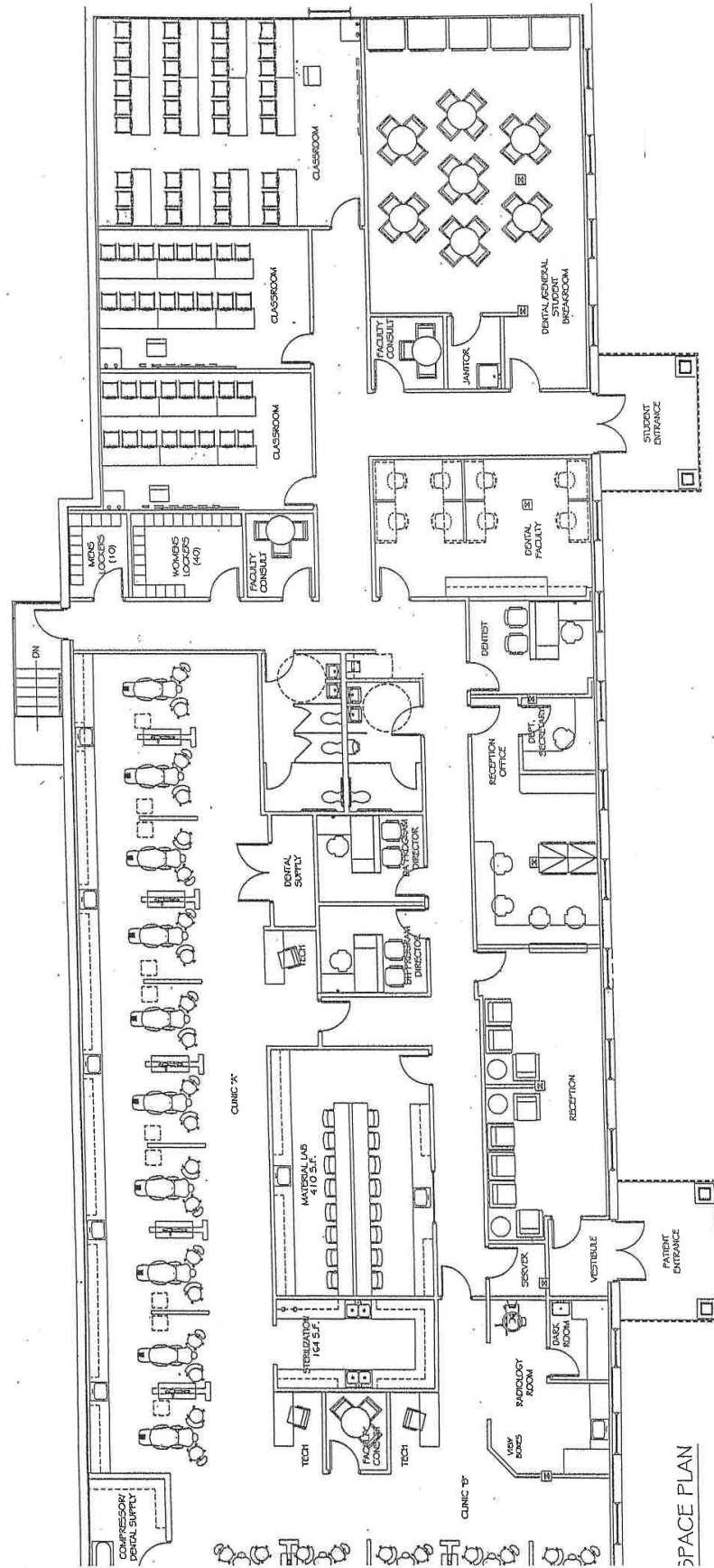
Fortis Institute Building 2 Medical and Massage



Fortis Institute, Scranton Floor Plans and Evacuation Maps #3



Fortis Institute, Scranton Floor Plans and Evacuation Maps #4



Appendix 3: Accident Report



ACCIDENT REPORT

All injuries should be reported immediately.

School Name: _____

Name(s) of student(s) involved: _____

Name(s) of employee(s) involved: _____

Date and time of accident: _____

Location of accident: _____

Describe what happened (attach additional sheets if necessary):

Why did this happen? _____

Describe injuries: _____

Were there witnesses? Yes _____ No _____

If yes, list their names and provide signatures if possible:

Were police, fire, or ambulance called? Yes _____ No _____

If yes, explain _____

Were photographs taken of the scene? Yes _____ No _____

Date of Report _____ Signature _____

INSTRUCTIONS FOR USING THIS FORM AND FOR REPORTING ACCIDENTS

- This form is for internal use to document and report accidents.
- Whenever an accident results in an injury or material property damage please fax a copy of the completed Accident Report to Abby Kozak in the corporate office.
- If you use this form to document minor mishaps or if no personal injuries or property damage resulted from the incident, then you do not need to send a copy to Abby or the corporate office.
- In addition to using this form for internal record keeping, notify our insurance company of accidents involving personal injury and property damage.
- It's advantageous to take photos of accident scenes whenever possible. Document everything that may be helpful to understanding what happened and why.
- For Workers Compensation, General Liability, and Automobile Claims please contact Travelers Insurance by calling [\(800\) 238-6225](tel:8002386225). Education Affiliates' policy numbers are:
 - Workers Compensation - UB2S70914022
 - General Liability - Y6307G095084
 - Automobile Liability - 8109M66495222
- For property damage (i.e., flood, fire, damage to your building), theft of property, or a possible student malpractice claim (an accident that happens at an externship or clinical site) please contact Abby Kozak for assistance with reporting to the insurance companies.
- For student injuries during school, please contact Abby Kozak. When a student has no personal health insurance to pay medical bills for an accidental injury, then a claim can be submitted to the company's Student Accident insurance policy using the Student Accident claim form.
- You can call Abby Kozak for assistance at extension 2335.

Note: The Accident Report form was updated 8/22/2022.

Appendix 4: Checklist for Emergency Situation

In the event of a potential crisis, the following minimal steps should be taken:

- () Notify Campus President or designee.
- () Notify the proper emergency personnel.
- () Notify other members of the Emergency Response Team
- () Campus President notifies the Education Affiliates Corporate Staff
- () Information is communicated to the students, faculty, and staff.
- () If necessary, a place and time for the Emergency Response Team to meet is set.
- () Others are included in the meeting if necessary.
- () Campus President or designee coordinates compilation of a report of the incident, actions taken, and outcomes.

Appendix 5: Action Plan

When a meeting of the Emergency Response Team is called, minutes of the proceedings should be kept. These minutes should outline the emergency/crisis, what steps were taken to deal with the situation, and who was assigned responsibility for carrying-out the action plan. The following form should be utilized.

Type of Incident: _____

Description:

Date of meeting: _____ Recorded by: _____

Persons Attending:

Prepare a summary of the situation. Include information about individuals involved, facilities and equipment, campus incident reports, witness testimony, etc. This document can be modified to serve as an internal memo or a fact sheet to be maintained as a record of the incident.

Assigned to: _____ Deadline Date: _____

Special Instructions:

Gather information from relevant personnel and/or offices. Individuals affected by the emergency/crisis may have information that needs to be copied to add to the summary report.

Assigned to: _____ Deadline Date: _____

Special Instructions:

Appendix 6: Guidelines for OSHA Training and Updating

The following guidelines pertain to the OSHA training that is recommended for employees at Fortis Institute.

New Hires

It is recommended that new employees who are at risk regarding blood borne pathogens or hazardous materials complete the Education Affiliates “LEARN” on demand training course, ‘FAC OD205 OSHA’ that can be accessed at <https://edaff.sharepoint.com/sites/LEARN>. They should also meet with the campus designated OSHA Coordinator, if available or their supervisor, to obtain additional information or if there are any questions regarding the training.

Additional LEARN courses required at the time of new employee hire are:

- [COR OD100 New Employee Orientation](#)
- [COM OD101 Title IX/Violence Against Women Act \(VAWA\) Training](#)

(The New Employee Orientation and the Title IX/Violence Against Women Act (VAWA) Training are required for all Education Affiliates new employees to complete.)

Employees

Upon being hired, each employee should be placed in one of three categories as outlined below.

Category 1

It is recommended that new Faculty with exposure to bloodborne pathogens and hazardous chemicals and who teach in a skills lab where students use related equipment in the process of learning participate in OSHA training and that the training be completed prior to teaching in a laboratory. The OSHA course available on the LEARN site is recommended for new faculty who may be “at-risk” to exposure to bloodborne pathogens and hazardous chemicals.

As a safety measure it is recommended that all Faculty, regardless of exposure, participate in an OSHA training update on an annual basis.

Category 2

Any Faculty member who does not have daily exposure to bloodborne pathogens, etc. are placed in this category. This category includes General Education Faculty, Externship Coordinators who do not teach, Director of Education, Dean of Nursing who does not teach skills labs and clinical classes, Career Services and Student Services Staff and Admissions, Business and Finance personnel.

Category 2 employees are not required to complete OSHA training, but it is available for them to participate in this training. The following LEARN courses are required at the time of hire for the Category 2 employees to take:

- [COR OD100 New Employee Orientation](#)

- [COM OD101 Title IX/Violence Against Women Act \(VAWA\) Training](#)

(The New Employee Orientation and Title IX/VAWA Training are required for all Education Affiliates new employees to complete.)

Category 3

All other employees on campus must follow the same guidelines as Category 2 employees. They are also able to participate in the LEARN OSHA initial and refresher training as new and continuing employees.

The following LEARN courses are required for Category 3 employees at the time of hire are:

- [COR OD100 New Employee Orientation](#)
- [COM OD101 Title IX/Violence Against Women Act \(VAWA\) Training](#)

(The Title IX/Violence Against Women Act (VAWA) Training is required for all Education Affiliates employees to complete on an annual basis.)

No further training for Category 3 employees is required unless there is a change in position to another category.

OSHA Course Available on LEARN

The description of the one hour, on-demand, online OSHA Course (FAC OD205 OSHA) offered via Education Affiliates **LEARN** resources is listed below:

This training session is designed to help faculty learn about the Occupational Safety and Health Act (OSHA) of 1970 and discover how it relates to our campuses. Faculty will also learn about the regulations related to Bloodborne Pathogens and compliance in a step-by-step approach to the federal law.

Fortis Institute Administration may contact OSHA at **(800) 321-OSHA** or visit www.osha.gov for further guidelines and free training materials on the following topics:

- Bloodborne Pathogens Facts and Plans
- Hep B Fact Sheet
- Reporting Incidents
- Personal Protection
- Sharps Fact Sheet
- Job Safety and Health Fact Sheet; and
- OSHA ECP – Plan

Appendix 7a: Emergency Preparedness Plan Training & Testing Tracking

Any time training or testing is conducted, it must be documented in the below chart.

Type of Training Conducted (i.e., Emergency Notification System Testing, OSHA, Active Shooter Training, etc.)	Training/Testing Performed by which Department or External Company	Training Date	Training/Testing Documentation Location	Campus President and/or Director of Education (Electronic Signature Optional)
Emergency Notification System Training/Testing	Corporate IT Department through 'Ignite to Learn' Campus Portal Application System	Start: 6/24/2022, 2:40 PM End: 6/24/2022, 3:00 PM	Documentation is located within the 'Ignite to Learn' Campus Portal Application System	Chris Jones, Director of Education
Emergency Notification System Training/Testing	Corporate IT Department through 'Ignite to Learn' Campus Portal Application System	Start: 6/26/23, 1:45 PM End: 6/26/23, 2:00 PM	Documentation is located within the 'Ignite to Learn' Campus Portal Application System	Susan Lynch, Campus President <i>Susan Lynch</i>
Emergency Preparedness Plan and OSHA Hazard Communication Standard Training	Accreditation and Licensure Provided Training Materials for All Staff and Faculty	<i>Anticipated 04/2024</i>	SharePoint, Accreditation and Licensure Folder, Tools, Emergency Preparedness Plans	Susan Lynch, Campus President <i>Susan Lynch</i>

Appendix 7b: Sample Employee EPP Receipt and Training Template

Emergency Preparedness Plan

Acknowledgement of Acceptance and Understanding and Training Participation

By signing below, I signify that I have had the opportunity to read the Emergency Preparedness Plan and to receive clarification on anything that was not clear to me. In addition, I have received training on the different aspects of this plan and fully intend to follow the policies included in the document.

I understand that there will be updates to this document that I will be expected to read and accept. I will also be expected to attend any subsequent training that may be necessary as the topic of Emergency Preparedness evolves.

Printed Name

Signature

Date

Appendix 7c: Sample EPP and OSHA Training Template

Emergency Preparedness Plan and OSHA Training

List of Participants

Printed Name

Signature (Digital or Wet) / Date

Printed Name

Signature (Digital or Wet) / Date

Printed Name

Signature (Digital or Wet) / Date

Printed Name

Signature (Digital or Wet) / Date

Printed Name

Signature (Digital or Wet) / Date

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Signature (Digital or Wet) / Date

Printed Name

Signature (Digital or Wet) / Date

Printed Name

Signature (Digital or Wet) / Date

Printed Name

Signature (Digital or Wet) / Date

Printed Name

Signature (Digital or Wet) / Date

Printed Name

Signature (Digital or Wet) / Date

Appendix 8: Emergency Preparedness Plan Update Tracking

Any time the Emergency Preparedness Plan is updated the date of revision should be noted in the table below.

Version	Date	Campus President or Director of Education (Electronic Signature Optional)
1	November 2023	Susan Lynch, Campus President <i>Susan Lynch</i>
2	April 15, 2024	Susan Lynch, Campus President <i>Susan Lynch</i>

Appendix 9: Campus Specific Communication System

Communication System:

Depending on the nature of the emergency a variety of communication tools may be used. It will be the responsibility of the Campus President, the Director of Education or designee to maintain communication with all individuals on campus including staff, faculty and students, as well as with individuals associated with local agencies and Education Affiliates Corporate Staff.

Below are the methods of communication that may be employed depending upon the nature of the emergency:

- General announcement in the building by a Member of the Emergency Response Team.
- **The signal to evacuate the building by the activation of the Emergency Notification System that can be accessed through the 'Ignite to Learn' campus portal.**
- Speaker on phones. The Emergency Response Team will utilize the phone speaker for an on-site public information and instruction purposes.

Appendix 10: Scranton, PA Division of Emergency Management

OUTSIDE AGENCIES EMERGENCY CONTACT INFORMATION

Lackawanna County Center for Public Safety

30 Valley View Drive, Jessup, PA 18434

Phone: 570.307.7304

https://www.lackawannacounty.org/government/departments/emergency_management.php

Lackawanna 911 – Emergency Services

30 Valley View Drive, Jessup, PA 18434

Phone: 570-307-7301

<https://www.lackawannacounty.org/government/departments/911/index.php>

Scranton Fire Department

Emergency: Dial 911

Non-Emergency – 570.342.9111

Suspicious Concerns – 570.348.4161

<https://scrantonpa.gov/sfd/>

Police Department

100 South Washington Avenue, Scranton, PA, 18503

Emergency: Dial 911

Non-Emergency – 570.348.4130

<https://scrantonpa.gov/spd/>

Appendix 11: Frequently Asked Questions

The following are most of the frequently asked questions and the recommended answers and/or courses of action.

- **What if I see a gun in a student's purse, book-bag, or under a jacket?**
 - Have someone take over the discussion for a few minutes and calmly excuse yourself from the class. Go immediately to the Campus President's or the Director of Education's office; they will call 911.
- **What if a student displays strange behavior (extremely belligerent, drunk, and high on drugs)?**
 - Have someone take over the discussion for a few minutes and calmly excuse yourself from the class. Go immediately to the Program Director's or the Director of Education's office; they will handle the situation.
- **What if I see a person on campus who looks like he or she does not belong?**
 - Go immediately to the Program Director's, Director of Education's or the Campus President's office; they will handle the situation.
- **What if a student, faculty or staff member, or former employee becomes abusive or violent?**
 - Immediately notify the Director of Education's or the Campus President's office.
- **What if I think I am being stalked?**
 - Immediately notify the Director of Education's or the Campus President's office.
- **What if someone becomes injured or ill in my class?**
 - Immediately notify the Front Desk Staff.
- **What if I am the victim of sexual harassment?**
 - Employees should notify the Campus President.
 - If the Campus President is involved, notify the corporate HR.
- **What if I know of a situation involving sexual harassment?**

- Report student harassment to the Director of Education.
 - Report employee harassment to the victim's immediate supervisor and/or the Campus President.
- **What if I have a student threatening suicide?**
 - Immediately notify the Director of Education's or the Campus President's office.
- **What if I have a student who shows symptoms of depression or anxiety?**
 - Immediately notify the Director of Education's or the Program Director's office.
- **What if a police officer shows up at my class and wants to talk to a student, or serve a warrant on a student?**
 - Request the officer to first contact the Director of Education's or Campus President's Office. If the officer refuses to comply with your request, do not resist in any way. Immediately go to the Director of Education and report the incident.
- **What if a faculty becomes ill during class?**
 - A student in the class should notify the Program Director or the Director of Education immediately.
- **What if a faculty feels threatened by a student?**
 - Leave the room. Go immediately to the Director of Education's or the Campus President's Office.

Appendix 12: Education Affiliates Pandemic Plan

Pandemic Plan Overview

Introduction

The most recent virus was declared an official Pandemic as the prevalence constituted a major outbreak and serious concern. Should the Covid-19 Coronavirus suddenly become excessively virulent, or another pandemic level threat presents itself, it is in the best interest of the Education Affiliates community to follow best practices in pandemic planning and preparations, and to be well equipped to mitigate and manage the worst-case scenario. Therefore, this guide has been developed with the most severe conditions in mind and may be scaled back as prudent and necessary.

Education Affiliate's Pandemic Plan is designed to deal with a pandemic of **Severity Level 6**, the most severe. To prepare for the most severe health scenario to affect the campus community — that of a highly infectious and fatal virus entering the United States — this plan is based upon the assumption that the worst-case scenario may require the campus to suspend regular on-campus academic programs and most non-critical operations for a number of weeks or months until the rate of transmission of the virus begins to subside. NOTE: This is a worst-case scenario, and our primary goal is to maintain the continuity of the educational experience through alternative means to include distance education provided that any needed approvals are obtained from regulatory agencies to allow students to fulfill their educational goals. Our main concern is always the health and safety of our students and employees.

Given how easily seasonal viruses spread in general, it is assumed that the academic environment of campus classrooms may be a challenge to maintain in a virulent and severe global pandemic without putting students, faculty, staff and others at risk of infection. However, all steps will be taken to ensure the proper cleaning/sanitizing of the campus environment on a routine basis. Health sources recommend the early introduction of non-pharmaceutical interventions, including taking steps toward social distancing, minimizing public assemblies, proper cough/sneeze etiquette, increased hand washing, and other actions to slow the spread of the virus. At the height of a pandemic outbreak, few students may feel comfortable sitting in classes without being fearful for their own health. In addition, the College could be mandated by local, state, or federal authorities to reduce operations and implement social distancing measures.

This plan applies to subsequent waves of a pandemic outbreak which could interrupt normal functioning from two to four weeks to several months. At all times, the health and safety of the campus community is of paramount importance. Protocols for health and safety measures have been developed and are included in this document.

Disruption of Delivery of Goods and Services

This plan operates under the assumption that as the college undergoes internal disruption from illness and absenteeism, goods and services provided by the larger community will also face comparable disruptions in delivery. This will be mitigated, to the extent possible, by planning to ensure adequate supplies of critical inventory, identifying alternate suppliers, and stockpiling of custom supplies that may be difficult to obtain through alternate means.

Social Distancing

Education Affiliates Campuses will implement social distancing measures in the event of an imminent outbreak in the local area, which may mean cancelling or suspending social events, but it will need to maintain basic systems and functions. Although suspending on campus classes could be disruptive for students wishing to complete their programs in a timely manner, the Pandemic Plan contains this scenario to help protect all members of the campus community. Campus closures will be reserved as a last resort, however, to ensure the maximum continuity possible, given the existing conditions.

When on-campus classes are suspended, most campus academic, administrative, and support operations may be substantially reduced or discontinued. Nominal facilities and utilities support will be continued, and routine, normal daily housekeeping and non-critical maintenance activities will be curtailed until the re-opening of campus operations has been announced.

Employees designated as “required staff” during an emergency are required to report to campus or they may need to function from either remote or alternative campus locations to maintain required support services and systems. Actions to limit exposure of required staff to the virus will be implemented. Staff may be requested to work multiple shifts and required staff may need to be on campus to provide required services/functions, as determined by the Campus President.

Loss of required staff to illness or care for a loved one will necessitate development of back-up options for essential functions. Absenteeism attributable to illness, the need to care for ill family members, and fear of infection may impact the campus operations (<https://www.cdc.gov/flu/>). Absenteeism may also be increased by the closing of day care centers, public schools, quarantines, and other measures taken by public health officials early in the pandemic.

Plan Management

The decision to suspend or curtail any academic program will be made by the Campus Emergency Response Team, headed by the Campus President and in consultation with the Education Affiliates Crisis Management Team. It will occur at a point after cases are discovered in the local area and be based upon a combination of the following decision criteria/factors:

- World Health Organization declaration of Phase 6 — Pandemic period: Increased and sustained transmission of a novel severity 4-5 virus.
- Confirmation of a high rate of infectivity (rate of infection), morbidity and serious mortality (death rate).

- Transmission in the general U.S. population.
- Rate/speed of disease spreading.
- Local public health recommendations to curtail/cancel public activities in the county or state.
- Declining class attendance.
- Rising employee absenteeism.
- Other regional schools/school systems closing.
- Transportation systems closing/curtailing of interstate travel.
- Other factors as appropriate.

Communications

Education Affiliates has existing communications resources that can be mobilized for quick response in the event of a pandemic emergency. Media relations include use of the Education Affiliates Colleges' homepages/Facebook sites, schools' Emergency Notification Systems and local media stations are additional assets available to support the communications plan.

Those affiliated with the college, even if they are not employed or enrolled, will require information on the institution's plans and implementation during the crisis. Parents and families, the surrounding community, governing bodies, and elected officials may require periodic updates. Communications plans are an integral part of this pandemic response plan, as identified herein.

Internal Communications:

If the World Health Organization and CDC identify cases of sustained human-to-human transmission of a potentially fatal pandemic in the United States, the Campus Emergency Response Team will be convened. As evidence of potential pandemic increases in the local area, the Crisis Management Team at Education Affiliates will be notified and updated. Each of these primary areas of response is described below in more detail. Later in this report, these six general areas are used to organize the response of the Campus at each level of response action to the potential flu pandemic.

Mass Notification:

Communications will be maintained via the use of the student portal, ADP portal, web, email, telephone, and other media, depending upon their continued availability.

Communications will be needed for various audiences at different stages of the pandemic. Specific plans for communications are outlined in the Pandemic action levels in the following sections of this plan. Draft communications will be developed in advance by the Education Affiliates Marketing Team as necessary and appropriate to address issues within each of these stages.

Email: Mechanisms are in place for authorizing and sending mass email to the campus community. As the situation develops, email services for the campus community will be supported with designated required staff and will include all faculty, staff, and student accounts.

Telephone: Landline telephones will be supported and will initially include all current telephone lines. These telephones can be used to disseminate critical information to the campus via recorded voice mail messages. Cell phones may also be used for direct communication with required employees as needed, depending upon availability of services and contact information.

Other Media: Critical messages may be disseminated by Marketing via social media, newspaper, commercial and/or public radio broadcast messages.

Academic Programs

Academic continuity of each course will be coordinated by Academic Deans and Program Directors, as needed. These efforts will be guided by Education in coordination with Compliance to ensure accreditation requirements continue to be met despite recommended, temporary changes that may need to be made to academic programs.

As mentioned earlier all efforts will be made in the event of an emergency including a pandemic to provide for the continuity of education for individual students through distance education, if necessary, provided that needed approvals are obtained from the school's regulatory agencies. When Education Affiliates suspends the on-campus delivery of an entire academic program for an extended period, consideration will be given to the timing and duration of the suspension of the on-campus academic programs. If the on-campus shutdown is less than two weeks, it will be assumed that the classes for that term can be completed. If the closure is more than two weeks, the term may be extended, if all other alternate forms of instructional delivery (including online and other delivery methods) have been exhausted. If it is within fourteen days of the end of the term, the registrar can accept grades at the point of closure, provided all accreditation requirements for the courses have been met. The goal, if possible, would be to recover and/or mitigate any time lost. Finalization of the plan for covering time lost will depend on several variables that will be evaluated as appropriate. In addition, guidance by the Department of Education and other relevant Accrediting and State Agencies will be taken into consideration as we may have significantly greater latitude depending on the severity of the pandemic.

For *individual student absences*, alternate forms of instruction on a course-by-course basis will be determined by faculty and their Program Directors and will be evaluated as appropriate and necessary. These alternatives will support the course objectives, the syllabi, and the planned assignments for the course.

The College's established refund policy on tuition and fees is found in the *college catalog*. Modifications of this policy would be based on length of closure, cancellation of classes/services, and granting of academic credit. In extreme cases there may be other guidance from the

Education Affiliates Crisis Management Team as we want to ensure we are providing appropriate support to the students.

Health Care and Safety

Employee and personnel safety guidelines, safety training and personal protective equipment (PPE) recommendations and directions for use will be coordinated by the Campus Emergency Response Team. Each campus will be responsible for distributing and/or displaying preventative information to the campus community.

Personal Protective Equipment

Medical Assisting and Nursing faculty may train and consult other faculty about safety and regulatory issues, including the use of Personal Protective Equipment (PPE) for infection control. PPE in this context may include antiseptic hand hygiene, and non-latex gloves made available at all computer workstations, and other safeguards that may be identified, as necessary. There are procedures outlining the proper donning and removal of this equipment and the conditions in which the equipment or series of equipment is required to prevent transmission of respiratory pathogens. Currently, surgical type masks are not recommended, as they provide limited protection against respiratory viruses. They can limit the spread of viruses from infected individuals, but this Plan recommends those individuals stay home until they are no longer shedding the virus.

Administrative Services: Faculty and Staff

Relevant policies and procedures related to faculty and staff will be coordinated by Education Affiliates Corporate Human Resources Staff. Any specific concerns, or self-identification of high-risk individuals should be made directly to the Campus President.

In the event of suspension of activities and/or campus closure, campus departments must consider operational contingency plans, within the following guidelines:

- A) Essential operations must be maintained while preserving health and safety of all and protecting property/ assets/ resources.
- B) Supervisors are responsible for assessing their work environment and ensuring recommended health and safety policies and protocols are followed.
- C) Supervisors will deploy their available work force to maintain required/ essential functions to the maximum extent possible, within established parameters of federal and state regulations, and organizational policies.

Defining Essential Functions

An important component of pandemic planning is to determine the essential functions within each department and define the skills and qualifications necessary to carry them out. Corresponding to

this is identifying additional staff members that possess these skills, other than those currently performing them. Supervisors must have the capacity and capabilities to continue to schedule work and assign duties to employees, consistent with the employee's job description. In a health emergency, supervisors may re-assign employees to duties necessary while they explore alternatives to ensure essential functions are performed.

Essential functions are those tasks that, if not performed within a week, can have a significant, detrimental impact to the long-term operations or finances of the organization. To assist in this planning process, critical functions need to be determined to plan for the efficient mobilization of staff. The resulting matrix is based on four levels of operation as illustrated in the following matrix:

Defining essential functions:

	Description	Example
Level 1: Vital Department	The entire department performs functions that must be carried out despite conditions. Most of the staff may be required to carry out the functions.	Payroll
Level 2: Maintenance Department	Department functions will be reduced, and a limited scope of services will be provided. A skeleton crew can perform required functions.	Marketing
Level 3: Critical Title	Individual titles/ positions that have special responsibilities, perform critical tasks, have high levels of security or access privileges due to technical expertise.	Finance
Level 4: Reserve	These are departments that do not have essential functions that must be maintained, and their temporary halting of operations will have a nominal impact on the long-term operations of the organization. Individuals within these departments may be cross trained, however, to perform essential functions.	TBD

Pandemic Action Levels

If the disease progresses and becomes more widespread, the danger to the campus community will increase. The Education Affiliates Crisis Management Team has organized its planning and responses according to the following action levels. The progression of these levels may occur rapidly and may be altered due to the nature of the pandemic outbreak or recommendations of county, state, or federal authorities. A brief overview of these action levels is provided below, with more detailed plans by response areas outlined in the sections of this plan that follow.

Response Plan Summary

Level	Indicators	Campus Response	Institutional Responsibilities
0	Pandemic declared by the World Health Organization (WHO). Outbreaks may not yet be occurring in the region, but they are presumed to be imminent. Pre-incident planning and Preparations	Business as Usual: Emergency contact information for students highly encouraged communication methodologies introduced	<ul style="list-style-type: none"> • Develop and finalize plans for academic continuity, communications, policies, and procedures. • Determination of critical functions and essential employees and alternative modes of service delivery at each business unit/location. • IT/Education to coordinate technology resources will support operations
1	Increasing levels of human-to-human transmission in the US/ region. Daily surveillance by the Center for Disease Control (CDC)	Business as Usual: Health education processes underway, enhanced planning.	<ul style="list-style-type: none"> • Sustained Communication will be initiated. • Stockpiling of PPEs, etc. • Alternate faculty resources to be identified. • Alternate methods of instruction identified for courses. • High-risk individuals to self-identify.

			<ul style="list-style-type: none"> Awareness and personal hygiene posters to be displayed on campuses
2	Verified cases in the neighboring vicinity and one triggering event (rate and speed of transmission, high rate of infectivity and/or morbidity, local public health recommendations, falling class attendance, escalating employee absenteeism).	Social Distancing measures, possible cancellation of social activities and non-required functions.	<ul style="list-style-type: none"> Remote work plans will be finalized. Lines of succession communicated for key staff. Plans for sanitizing of classrooms and public areas investigated/ initiated. Heighted personal hygiene measures implemented. Emergency contact information for employees and students updated. Communication systems tested/ updated
3	Verified cases occurring on campus	Social distancing, possibility of alternative methods of instruction for affected students. All non-essential activities cancelled.	<ul style="list-style-type: none"> Mitigation mandated- such as regular disinfection of public areas and classrooms, PPE. Staff at high risk to work remotely, if possible.

			<ul style="list-style-type: none"> • Non-essential services curtailed or suspended. • Communication continues- hotline implemented
4	Public declaration of emergency closing of campus facilities	Campus closed at the request of County Health Dept, State officials, or Education Affiliates CEO	<ul style="list-style-type: none"> • Students and staff informed of procedures and updates to information. • Shut-down process implemented
5	Recovery	Campus re-opens	<ul style="list-style-type: none"> • Students and employees notified of details. • Services reinstated.

Response Action Level 0

Communications

Encourage campus faculty, staff, and students to become familiar with details of the Pandemic Plan.

Emergency Preparedness resources are marketed to members of the campus community and updated information is posted as appropriate. This resource is used during the Level 0 time to communicate with students, faculty, staff, parents/families, trustees, surrounding communities, local officials, state officials, and vendors.

Educational campaigns on non-pharmaceutical interventions such as preventive hygiene and cough and sneeze etiquette are increased.

Department-Specific Response

All units identify required functions/services and required staff to maintain necessary operations during Levels 1 - 4 and inform individual staff of their status. This should be done as soon as possible.

All units confirm communication protocols for all staff levels (emails, meetings, conference calls, hotline, etc.)

Marketing assists with drafts of emails, web/Facebook postings, FAQs, and leverages flyers from the CDC to be used in (a) educational campaigns about hand hygiene, and cough and sneeze etiquette, and (b) a personal protection campaign (e.g., what items students should have/store in their rooms and personal safety precautions).

Human Resources disseminates information about applicable leave policies and information on communicable diseases to faculty and staff.

Compliance manages distribution of information and consults on safety and regulatory issues regarding the use of Personal Protective Equipment, and the Protocol for Cleaning and Disinfection of Environmental Surfaces.

Information Technology/Education develops plans for maintaining the required functions/services and systems to support campus communication and instruction during a pandemic, including technology to facilitate work that may need to be performed remotely.

Academic Programs

Academic Deans request faculty members discuss concerns for the implications of a disruption of class activities if academic activities are curtailed due to a pandemic outbreak.

- Academic departments and faculty have flexibility working with their classes- solutions may vary by program, class size, accreditation requirements.

Academic Deans work with Program Directors to encourage development of emergency plans for faculty absenteeism and academic continuity alternative plans.

Health Care and Safety

Direct coordination with local Departments of Public Health.

- Each campus should establish a designated individual that will serve as the liaison/campus representative in all communications with the local health department.

Additional campus-level responsibilities for health care and safety preparations include:

- Review organization chart & identify primary and back-up staff to provide anticipated support.
- Cross-train staff, as appropriate.
- Identifies the appropriate quantities of PPE for required staff to perform their work and stockpile.
- Develop system for calling in and reporting to work, tracking absences.
- Coordinate infection control training, information, and other educational resources for students, faculty, and staff.

Situation Monitoring and Reporting

The designated health department liaison (Campus President or designee) will monitor, track and report possible infectious disease outbreaks through the established procedural guidelines with facilitation by the Crisis Response Team at Education Affiliates.

Influenza-like-illness cases (ILI) are tracked and reported to the local Public Health Department on a regular basis.

Human Resources

HR **establishes criteria** to determine required services/functions and distributes to operational units (required services are those that must continue for 8-12 weeks even if other functions/ departments close)

- Distinguishes between work that is required to be performed on site, that is required and can be performed off site, and that can continue from a remote location but is not required as part of the college's response to the pandemic or other emergency.
- Distinguishes between the work that is required to support the response to the emergency and the work that is required to support other required functions/services.

Education Affiliates Crisis Management Team determines what functions/services are required based on their impact on health, security, safety, legal imperative, and considering the up and downside risks of both performing or not performing the function.

Human Resources asks Department Heads to take the following actions:

- Determine what functions are critical within the unit and what functions are critical that they receive from other areas.
- The head of the unit responsible for the function/service will recommend the staff required to continue those functions/services at the level established by the pandemic plan and identify who will perform that work if the staff who are identified are ill or otherwise unable to work. In making these determinations, the head of the unit will consider the minimum number of staff necessary to perform the function/service safely.
- Identify back-up staffing plans if required staff are ill or unavailable.
- Assists local areas to determine ramp-up/ramp-down needs.
- Develops template for communication to required staff outlining expectations and responsibilities.
- Coordinates revision of job descriptions to state that the work performed by that position may be required in the event of a pandemic/other emergency situation-
- Develops FAQs for required staff.

Campus Level

- Notify staff if they are considered required staff (or if they will back up required staff who are not available) and tell them what that means in terms of expectations if they are required staff.

Working Remotely

- determine what work can be done from home or remotely.
- Develops additional guidance, if necessary, to ensure that adequate and ongoing protection of company assets and intelligence continues as staff transitions to remote locations during the pandemic.
- HR reviews existing procedures for work to be performed from home or remotely.
- HR/campus add any necessary procedures to meet increased instances of staff working off site if operations are curtailed or the campus is closed.
- IT/HR consider necessary technology enhancements to allow ongoing remote work (e.g., VOIP, Laptops, Webcams, VPN, etc.)

Reviews relevant policies/processes:

- Flexible work options (in place, currently being reviewed)
- Reviews and updates employment policies concerning flexible work options (telecommuting, work from home), volunteers, etc.
- Whether to use willing volunteers (students, student spouses, community members, staff working out of classification)
- Creates and issues FAQ with information on such subjects as work continuation, pay, benefits, workers' compensation, etc.

- Ensures processes are in place to record hours worked in the event of a closure.
- Ensures Benefits processes are in place in the event of closure.

Campus Administration

- Inform staff what possible staffing plans are, given various possible scenarios.
- Inform staff what possible return to work plans are given various possible scenarios.
- Implement plans to stock up on necessary supplies.

Procurement

- Determines necessary supplies (follows from decision on required functions/services).
- Decides what supplies should be ordered/stocked ahead and on what timeline.
- Stockpiles essential/ custom-ordered supplies.
- Determines who will deliver necessary supplies in the event normal vendors are unavailable.
- Determines who will provide essential services now contracted to outside vendors.
- Follow up on vendors' contingency plans.

Campus Operations

- Updates contact information for all staff (currently in place).
- Defines required staff by incident level and their primary functions.
- Defines a backup plan for required staff.
- Defines which required staff can telecommute (indicated in Level 2).
- Trains required staff (required for use for Personal Protection Equipment and communication protocol).
- Works with Human Resources to understand any limitations to compel staff to work. Clearly identify employee compensation related to work status (when compelled to work or when compelled to remain away from work).
- Defines required contracted services and their scope (indicated in Level 2 below).
- Predefines an onsite pandemic emergency inventory and when and how inventory will be deployed (masks, special hand cleaning soap, food and water, fuel).
Schedule periodic inventory assessment. Initial pandemic response inventory suggestions include:
 - Hand cleaner located in each restroom, computer lab and LRC.
 - Additional supplies and PPE, as necessary.

Response Action Level 1

This level begins when preliminary cases of efficient human-to-human transmission of the pandemic illness are reported in the US/ region. The campus remains open with “business as usual,” but there is enhanced planning for level 2.

Communications

Information on the Education Affiliates Colleges’ websites/Facebook are updated as needed to communicate the status of the pandemic and institutional responses.

Additional efforts to market the website are also implemented.

Email alerts are sent to students, faculty, staff, and parents/families of students informing them of the status and encouraging them to refer to the CDC website.

Communicate any changes to travel policies, as appropriate.

Ensure the Emergency Response Team is prepared to take its functional role at the time the triggering criteria is met.

Update the Information Hotline (provided that existing hotlines typically used for weather or other purposes can be leveraged) with appropriate action plan level instructions.

Test the internal and external communication strategies for efficacy using the communication contact lists.

Ensure all public information requests and reports are properly channeled.

Department-Specific Response

All units update departmental specific information as conditions evolve.

Finance and accounting to determine what codes to be assigned to pandemic-related expenses.

Provide health promotion activities that stress infection control measures, e.g., hand hygiene and cough and sneeze etiquette.

Academic Programs

Classes continue campus uninterrupted, but preparations continue for possible interruption of class schedule, and alternate methods of instructional delivery-options (with appropriate approvals obtained from regulatory agencies) include:

- E-mail
- Student portal
- Video conferencing tools/conference bridge for call-in class participation
- Development of additional resources or materials.
- Faculty trained in the use of technology and remote instructional techniques.
- Note: Details on the specific technology will be shared by the Education Team.

For consideration: it would require significant additional resources to create course shells on the LMS platform; however, this may be necessary at some point.

Discuss other campus resources to support ongoing campus operations and to also support the delivery of simulations/clinical experiences in compliance with agency guidance. This may include role plays with students presenting as patients, case studies, on campus activities to simulate the lab environment, etc.

Academic Deans and Program Directors finalize plans to address issues of student and faculty absenteeism.

Academic Deans and Program Directors ensure that there are appropriate activities/assignments available to provide students who may be unable to attend classes due to a 14-day quarantine situation.

Faculty ensure they have accurate contact information for all students in their courses (i.e., Phone, e-mail).

Communication is initiated with externship sites to determine contingency plans.

It is recommended that the faculty include information about the pandemic operations in their course syllabi addenda.

Faculty place as much course content as possible, including course syllabi, assignments, and lecture outlines as appropriate in the student portal. In addition, faculty may attempt to schedule important in-class assessments and presentations outside the time frame in which the infection rate is expected to surge. Note in the case of presentations and exams there are online options that may be more appropriate, and that determination may be made in consultation with the Education Affiliates Education Leadership.

Students are advised of appropriate attendance policies and procedures for make-up work in the event of illness or pandemic-related absence.

Health Care and Safety

Planning

Update the most current Pandemic Plan with any new developments.

Test the action plan with table-top exercise drills or training scenarios for key staff and repeat if deemed necessary.

Ensure all elements of the Pandemic Plan become available for instructional and resource use by appropriate staff.

Pandemic Education

Maintain updated information on low-cost, public healthcare options that are available and accessible for the student population.

Distribute and post "key messages" educational flyers for each action level.

Ensure required health role requirements are met and understood by all Staff.

Ensure campus staff are made aware of any significant changes to the Pandemic Plan via training sessions, staff meetings, email list distributions and/or individual staff memorandums.

Situation Monitoring and Reporting

Continue tracking and reporting influenza-like-illness cases (ILI).
Continue active communications with local health departments.
Continue active tracking of regional data as well as benchmarking comparable higher education institutions.
Continue to maintain active participation in CDC updates and webinars.

Staffing

Prepare to implement the staffing plan for permanent, contingent and relief staff.
Monitor staff for signs of illness and re-educate staff, if necessary, with the guidelines for staying home if ill and returning to work after being ill.

Faculty and Staff

Verify back-up plans to obtain products/services if normal sources of supply are interrupted.
Communication developed in consultation with HR to be distributed to all staff simultaneously to inform required staff about their role and the company's expectations once it is imminent that it will change.
Communications, HR, Payroll, Benefits will inform all staff about work, pay, and benefits procedures in the event of closure.
Establish a staffing database of available staff that can be cross trained in advance.
Inform all staff of the College's plans for transition to and from different levels of limited operations in consultation with Marketing Staff.

Human Resources:

- Benefits:
 - Ensures procedures are in place to process appropriate claims, along with general liability claims, etc.
 - Establishes remote communications capability.

Campus Operations:

Facilities Operations

- All department functions in "normal" mode. Staff reports to work and completes work normally.
- Makes any required notifications to contracted services vendors.
- Reassesses emergency inventory and replenish if necessary.
- Assembles department leadership to review the pandemic response for gaps in coverage.

Response Action Level 2

This level begins after the first verified case in the immediate vicinity AND one or more other triggering events occur. College implements social distancing measures; other scheduled activities may be cancelled; and preparations are considered for the possibility of curtailed academic activities and/or cancelled classes on campus with alternative delivery approaches online being implemented.

Communications

- Information on the website/portal/Facebook page is updated to educate the campus community regarding flu signs/symptoms and when/where to seek help.
- Email alerts are sent to students, faculty, staff, parents/families, state officials, and vendors apprising them of activities on campus and steps being taken by the institution.
- Media may be alerted to the activities on campus and steps being taken by the institution as appropriate and initiated by the Marketing department.

Department Specific Response

All units keep staff in their areas informed of the status of the pandemic and institutional responses that can be expected.

Ensure updated contact information exists for staff and students.

Continue to publicize protocols for hand hygiene and cough and sneeze etiquette.

Implement a procedure for dealing with a possible increased media presence, including access issues, and referrals to public information staff.

Medical Assisting and Nursing students may assist in educating the campus regarding signs/symptoms and when/where to seek help.

Designated campus personnel conduct frequent consultation with County and State health departments and refer to CDC guidance.

Academic Programs

The Program Directors and Academic Deans test plans for offering alternate methods of instructional delivery.

If a decision to revise class time is announced, all academic classes within the affected program(s) communicate the details such as expectations, and the effective date/time are provided in the announcement.

Students are instructed to ensure that they have contact information for their faculty, and are informed of the communications mechanisms that will be used to obtain further instructions for each course they are enrolled in.

Students are advised of appropriate attendance policies and procedures for make-up work in the event of illness or pandemic-related absence.

If labs are closed, campuses will need to arrange appropriate make up options.

Health Care and Safety

An Information Hotline may be implemented (can we leverage existing hotlines typically used for weather or otherwise?) and updated with the appropriate instructions for reporting of cases and information on the status of classes on a daily or weekly basis as the situation requires.

Situation Monitoring and Reporting

There is daily (or more frequent) communication with key contacts at Education Affiliates

The daily reporting mechanism for students or staff seen and treated at any outpatient healthcare settings are implemented and mechanism are put in place to ensure reports are forwarded to the Campus President on a daily basis

Campus Presidents to report this information to Education Affiliates Crisis Management Team on a weekly basis.

Central reporting plans for tracking the following data are implemented on a weekly basis: prevalence of illness on campus; employee absence; number of students in self-quarantine; number of confirmed lab cases; number of pandemic staff and student absences.

All necessary departments and agencies are to be provided with the number of suspected and confirmed pandemic cases on a regular basis- mechanisms for this are established.

Personnel is designated to be accountable for the weekly count of staff seen for suspected cases and treated to be relayed to Human Resources to assist with continued contingency planning and decisions.

Reporting templates can be obtained from EA Corporate and/or Regional Staff.

Pandemic Education

Maintain updated information on website.

Distribution and posting of "key message" flyers for each action level continues.

Additional training and education for staff is assessed and implemented, if necessary.

Campus Operations

Facility Management:

Risk-containment strategies at all campus sites will be followed and adjusted, as necessary.

Measures to maintain security at all campus sites are assessed, followed, and adjusted as necessary.

Infection Control is implemented:

- Assess and report infection control issues to Campus Presidents and enact new recommendations as required.
- Ensure adherence to the protocol for disinfection of equipment, classrooms, and public areas.

Staffing

HR is responsible for all staffing issues that may arise because of the pandemic situation.

All staff will be expected to assume their required or expanded role, as identified during Level 1.

Staff is monitored for signs of illness with continued training on symptomatic patterns related to the pandemic influenza. Staff may be sent home or encouraged to work remotely if they are showing signs of ILI.

Student Services

- Sends mass emails to the campus community outlining the curtailed on-campus teaching schedule, cancellation of activities, social event cancellations, travel restrictions, visitor restrictions, direct email to relevant stakeholders, and changes in access to campus services (changes in hours of the LRCs, etc.)
- Implements travel advisory procedures for students who may wish to return home.
- Holds advising sessions for foreign students who may wish to stay in the U.S. during Levels 3 and 4.

Administrative Services: Faculty and Staff

Financial Aid's priority is ensuring student awards are up to date.

- management reiterates personal precautionary measures to help prevent exposure/infection to staff, and provide staff personal protective equipment, as necessary.
- Ensures all student disbursements/ refunds processing is up to date.

Cash Management

- Identifies potential changes in ongoing cash needs (i.e., changes in ongoing needs to pay vendors) to appropriately anticipate cash liquidity.
- Monitors pandemic-related expenditures for related reporting purposes

Campus level Human Resources

- Inform required staff of staffing changes/plan on an ongoing basis.

- Implement plans for staffing required services/functions as absenteeism escalates.
- Reviews with staff anticipated changes and expectations/ responsibilities.
- Permit non-required staff to perform required functions from home or remotely to maintain pay, as determined in Levels 0 and 1.

Campus Operations

- Begins securing buildings according to current and anticipated curtailed hours of operation and reducing corresponding staffing and services.
- Carefully monitors expectations. Matches expectations to staffing levels. As work reduces, begins reducing staff and contracted services to required levels.
- Notifies required staff they are on “active duty.” Begins sending non-required personnel home based on the pandemic staffing plan. Clarifies “standby” requirements.
- There are no contingency plans in place for obtaining additional security personnel from outside vendors, so care is needed to augment staffing according to standard HR policies

Response Action Level 3

Depending on local conditions, the campus may experience its first outbreak of flu-related illness within days of reaching level 2, so response level 3 may be rapidly reached. As soon as practicable thereafter, most non-required academic activities and social events are cancelled or postponed.

Communications

Information on the website, portal, and Facebook are updated, as appropriate.

Formal letters and/or email alerts are sent to students, faculty, staff, parents/families, state officials, and vendors apprising them of activities on campus and steps being taken by the institution.

Appropriate telephone contact is made with other stakeholders.

Marketing representatives contact the media to apprise them of the evolving status of activities on campus and steps being taken by the institution, as to where to find additional information, such as a website or hotline.

All units follow protocols for updating other communications, including approvals and sequencing of updates, relay of information between departments and the Education Affiliates Crisis Management Team, considering the nature and volume of student, community, and media inquiries.

Designated personnel maintain contact with local public health departments.

Academic Programs

Academic Deans and Program Directors ensure that adequate faculty coverage exists for each course. As classes are cancelled, updates are made to the hotline, or via other communications medium with as much advance notice as possible.

Program Directors will ensure that alternate mechanisms for instructional delivery have been implemented and are working efficiently.

All decisions on rescheduling of the academic calendar are made by the President.

If laboratory supplies are not available and a lab cannot continue its normal course of instruction, or cannot assure the safety of the lab participants, the lab portion of a course may have to be suspended independently from other courses in the program. In addition, alternative simulations/labs and learning approaches will be considered that may be delivered online.

Externships sites should be monitored for continuation/ anticipated disruptions to their programs.

Health Care and Safety

The Emergency/Information Hotline is updated with appropriate action plan level instructions for staff and students.

Situation Monitoring and Updates

Daily communication with key contacts at Education Affiliates continues.
Daily reporting of specific campus statistics is implemented and continues (examples of data reported are described in the response action level 2)
All necessary departments and agencies will be provided with the number of suspected and confirmed pandemic influenza cases on a regular basis.
A daily count of staff that are seen and treated will be reported to HR to assist with continued staffing and contingency planning and decisions.

Pandemic Education

Updated information on healthcare is maintained on the schools' website, campus portals, etc.
Distribution and posting of the "key message" flyers continue.
Newly identified training needs are assessed, and training resources requested, if needed.

Student Services

- Continues to maintain the emergency contact information, phone contacts and student tracking sections.
- Continues to document alternative destinations for students and staff to be able to maintain phone/email contact.
- Works with Marketing Staff to develop and deliver communications to keep students, staff and parents apprised of campus/evacuation status.

Administrative Services: Faculty and Staff

Human Resources

- Communicates personnel policies for pandemic conditions to Regional/ Campus Human Resources personnel.
- Campuses/ Departments communicate expectations of required staff and HR policies to required and non-required staff members.

Financial Aid

- The Financial Aid Office Staff continues reviewing requests for financial aid/assistance and processing disbursements/refunds.

Compliance

- Continues consultation with key stakeholders to manage campus closure and minimize risks.
- Non-required staff begin to operate remotely.
- Partners with Accounting Staff to capture categories of financial impact due to the campus closure.

Campus Operations

Facility and Equipment

Adjust infection control and risk-containment strategies at the campus site, as necessary.

Makes required modifications to systems in open buildings such as adjusting HVAC system controls to provide 100% outside air (versus recirculating air). Notifies building occupants of required changes that may cause discomfort such as decreasing building space temperatures.

Assure ongoing campus security and monitoring of building access continues.

Procure additional equipment/ services, if needed.

Coordinates with Building Managers to prepare for the potential of a full or limited shutdown on a temporary basis. Shutdown may include turning off utilities and building systems, closing windows, disconnecting plug-in equipment, discharging stored energy, etc.

Implement contracted vendor services pandemic response plans including:

- Custodial: coordinate custodial services to clean only specific buildings and not clean closed buildings
- Maintenance: only on emergency basis
- Trash: coordinate pick up of trash at open building dumpsters
- If possible, temporarily suspend all other services.

Staffing

Only required staff and required contracted services are maintained on campus.

Initial pandemic response on-site required staff includes:

- All managers and department heads
- Academic Staff, as necessary.

Information Services

Ensures department servers are available for staff on-site as well as those working remotely.

Response Action Level 4

This is a government-declared emergency condition, and most campus operations may be suspended and/or shut down. Once again, in this case Education Affiliates Corporate Leadership will strive to maintain continuity of operations through distance education methods provided that appropriate regulatory agencies' approvals have been obtained.

Communications

- Marketing posts and updates information on the Website and provides response to inquiries from the media.
- Formal letters and/or email alerts are sent to students, faculty, staff, parents/families, state officials, and vendors apprising them of activities on campus and steps being taken by the institution.
- Other appropriate telephone contact is made with other stakeholders.

Department-specific items

- Campus Presidents or their designees maintains contact with County and State health departments.
- Student Services maintain email contact and web information.
- Individual electronic inquiries will be forwarded to the appropriate department. Individual telephone inquiries will be referred to the Emergency Website or hotlines when appropriate.

Academic Programs

- All final decisions on rescheduling of the academic calendar are made by the Campus President in consultation with Education Affiliates Education Team.

Internal Communication

- Daily communication with key contacts at Education Affiliates continues.
- Daily reporting of specific patient statistics continues.

Situation Monitoring and Report

- Updated information on healthcare is maintained on the website.
- Newly identified training needs are assessed, and training resources requested, if needed.

Facility and Equipment

- Adjust risk-containment strategies at campus sites, if necessary.
- Maintain secure premises at all sites.
- Procure additional equipment if needed to facilitate re-opening.

Staffing

- Continue to monitor staff and report signs of illness.

- Use expanded/ cross-trained staff for crisis intervention services / grievance counseling for students, faculty, and staff.

Administrative Services: Faculty and Staff

- Individual departments continue implementing staffing plans as directed by Human Resources.
- Arrange as many alternate methods of instruction as possible, including video presentations, conference calls, internet-based learning, independent directed learning assignments, etc. to continue academic progress during closure.
- Human Resources will respond to any instances where the healthy required staff refuses to perform work as assigned.
- Schools plan for and provide essential resources to the extent they do not already exist; work safety guidelines comparable to staff, faculty cannot compel staff/volunteers to work.
- Financial Aid Office Staff
Reconcile aid/loan approvals and actual disbursements.

Response Action Level: Recovery

The recovery stage begins once the pandemic is under control and the campus prepares to re-open.

Communications

Re-opening procedures and timetable communicated via email, web, hotlines, and media.

Student return policy and procedures announced via email and web (e.g., health and safety precautions, what to expect, what to bring, etc.). Hotlines and internal and external media are used to refer community to the appropriate sources for detailed information.

Academic Programs

Assess the impact of the pandemic on instructors and faculty. Academic Deans and Program Directors evaluate their department and schools' capability to resume instruction of classes, and report to the Campus President

Implement mechanisms to assist with the evaluation of any academic work completed during the forced closure of the campus.

In coordination with the Emergency Response Team, the Admissions Office and Student Services Office Staff coordinate the resumption of classes and other academic activities.

The Campus coordinates with Communications and Student Services Staff in announcing the rescheduling and re-opening of the academic program.

Labs, externships, and other academic activities that have been suspended restart once the service support is in place to assure safety in operations and the availability of requisite materials and supplies.

Administrative Services: Faculty and Staff

Departments activate protocols for recalling non-required staff to prepare for resumption of classes, in accordance with re-opening procedures and timetables.

Finance & Banking Services inventories work done "outside" of a system that will need to be entered and reconciled; develops plan to accomplish.

Responsible area responds to any outstanding issues/concerns from closure (e.g., if Benefits question, Benefits handles)

Financial Management investigates funding additional costs.

Risk Management

- In conjunction with the Accounting Staff, develops a financial overview of the impact of closure.
- Assures financial risk transfers and risk mitigation procedures are adjusted to meet the changing operational needs.

Personal Protective Equipment Use by Employees

NOTE of CAUTION: Since information related to Pandemic Influenza or Covid-19 Coronavirus is subject to frequent and significant changes, readers of this document should check with the Education Affiliates Corporate Compliance Staff or review the information on the website of the Centers for Disease Control and Prevention (CDC) to ensure they have the most recent information.

to ensure they have the most recent version.

Characteristics of Influenza Transmission

Human influenza is transmitted from person-to-person primarily via virus-laden droplets (particles > 5 um in diameter) that are generated when infected persons cough, sneeze or speak. These large droplets can be directly deposited onto the mucosal surfaces of the respiratory tract of susceptible persons who are near (i.e., typically within 3 feet) of the droplet source. Transmission may also occur through direct and indirect contact with infectious respiratory secretions. Asymptomatic individuals in early stages of influenza could be infectious to others.

Standard precautions plus droplet precautions are recommended for the care of patients infected with human influenza. Wearing a mask is not recommended for routine use (e.g., in public) for preventing influenza exposure. In the United States, disposable surgical and procedure masks have been widely used in health-care settings to prevent exposure to respiratory infections.

About Personal Protective Equipment (PPE)

PPE is any type of specialized clothing, barrier product, or breathing (respiratory) device used to protect workers from serious injuries or illnesses while doing their jobs. PPE includes the following:

- Respiratory protection (i.e., surgical masks, N95s)
- Gloves
- Eye/face protection
- Clothing protection

When to use PPE

- Use PPE to cover the face, hands, other exposed skin, and clothing during activities that may cause exposure to body fluids.

Obtaining PPE

- You do not need a prescription to buy personal protective equipment.

- You can buy personal protective equipment from pharmacies, from medical suppliers, or from sources you find on the Internet (Note: During the Covid-19 Coronavirus Pandemic most suppliers were out of inventory).

PPE Training

- Personnel whose job responsibilities require PPE must be trained prior to its use.

Use of PPE

- Prior to putting on and after taking off a respirator or mask, wash hands thoroughly with soap and water or use an alcohol-based hand sanitizer to reduce the possibility of inadvertent contact between contaminated hands and mucous membranes.
- There is no proper way to wash or disinfect disposable PPE. Dispose of the equipment carefully after each use or if the equipment becomes soiled.
- Do NOT share personal protective equipment.

Disposing of Contaminated PPE

- Always wear medical gloves
- Place used or soiled PPE into a tied plastic bag to prevent dripping.
- Carefully clean waste containers with disinfectant or diluted bleach (1-part bleach to 9 parts water), and
- Wash hands thoroughly with soap and water or alcohol-based hand rub after handling.

Masks and N-95 Respirators

Surgical masks and N-95 respirators are disposable devices that cover the mouth and nose during medical procedures. They help protect the caregiver and patient against microorganisms, body fluids, and small particles in the air.

Surgical Masks

- Include masks labeled as surgical, laser, isolation, dental, or medical procedure masks.
- Help protect against microorganisms, body fluids, and large particles in the air environment.
- Designed to cover the mouth and nose loosely; not sized for individual fit.
- Help prevent exposure to others from the wearer's saliva and respiratory secretions.
- Made of soft materials and are comfortable to wear.

N-95 Respirators

- Designed to protect against small droplets of respiratory fluids and other airborne particles in addition to all the protection of surgical masks.
- Fit closely to form a tight seal over the mouth and nose.

- Require fit-testing and must be adjusted to your face to provide intended effectiveness.
- May be uncomfortable due to tight fit.
- Personnel with responsibility for direct patient care should be medically cleared, trained, and fit tested prior to use.

What you should know before using surgical masks and N-95 respirators:

- Prior to putting on a respirator or mask and after removing and discarding, wash hands thoroughly with soap and water or use an alcohol-based hand sanitizer to reduce the possibility of inadvertent contact between contaminated hands and mucous membranes.
- The use of surgical masks and N-95 respirators alone will not fully protect you from acquiring an infection. Other infection control practices such as handwashing, isolating infected patients, and practicing appropriate coughing etiquette, are also important to minimize your risk of infection.
- N-95 respirators must fit properly. An N-95 respirator that has not been fitted properly may leave unprotected gaps between the respirator and your face. These gaps will impair the respirator's effectiveness. Facial hair or unusual facial features make it difficult to fit N-95 respirators properly.
- Be aware that surgical masks are not fit-tested to your face and may leave unprotected gaps between the mask and your face.
- Be aware that masks lose their protective properties and must be changed when they become wet from saliva or respiratory secretions.
- Never wash or disinfect surgical masks or N-95 respirators.
- Never share surgical masks or N-95 respirators with others
- Re-use of surgical masks or N-95 respirators should not be done except under extenuating circumstances (if mask is protected by face shield during use)

Cleaning and Disinfection

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Cleaning and Disinfection

Cleaning **MUST** precede disinfection (some products can clean and disinfect — see label)

1. Most Flu viruses are inactivated by several disinfectants, including:
 - Phenolic disinfectants
 - Quaternary ammonia compounds
 - Peroxygen compounds
 - Sodium hypochlorite (house bleach)

- Alcohol
- Other germicides with a tuberculocidal claim on the label.

Look on the label for assurance of effectiveness against Flu.

2. Follow the manufacturers' recommendations for the use/dilution, contact time, and handling of disinfectants.
3. Classrooms/areas should be cleaned at least daily. In addition to cleaning floors and other surfaces, special attention should be given to frequently touched surfaces.
4. To avoid possible aerosolization of viruses, damp, rather than dry dusting or sweeping should be performed whenever possible. Dust horizontal surfaces by moistening a cloth with a small amount of disinfectant.
5. During wet cleaning, cleaning solutions and equipment become contaminated, clean less contaminated areas first and change cleaning solutions, cleaning cloths, and mop heads frequently.
6. It is recommended to use one bucket for cleaning solution, one for rinsing (double bucket method).
7. Equipment used for cleaning and disinfecting must be cleaned and dried after each use. Mop heads should be laundered daily and dried thoroughly before storage or reuse.
8. If carpeted areas are used, use a vacuum cleaner with high-efficiency particulate air (HEPA) filtration.
9. Keep areas around patients free of unnecessary supplies and equipment.
10. Do not spray rooms with disinfectant. This is potentially dangerous and has no proven disease control benefit.

Bleach: Concentration and Use

Bleach, also known as sodium hypochlorite, is an effective disinfectant against Avian Flu. The following are guidelines for the preparation and use of bleach.

Starting solution: Most household bleach solutions contain 5% sodium hypochlorite.

Recommended dilution: 1:10 dilution is the usual recommendation. Use 1-part bleach to 9 parts water for disinfection of surfaces.

Contact times by use:

- For wiping nonporous surfaces: a contact time of at least 10 minutes is recommended.
- For immersion (soaking) of items: a contact time of at least 30 minutes is recommended.

Note: surfaces must be cleaned prior to disinfection or immersion

Precautions for use of bleach:

- Bleach can be corrosive to metals.
- Protect your hands and eyes when using bleach.
- If bleach gets into the eyes, immediately rinse with water for at least 15 minutes and consult a doctor.
- Bleach should not be used or mixed with other household detergents as this reduces its effectiveness and can cause chemical reactions.
- A toxic gas is produced when bleach is mixed with acidic detergents such as those used for toilet cleaning. If necessary, use detergent first and rinse thoroughly with water before using bleach for disinfection.
- Bleach should be stored in a cool, shaded place out of reach of children.
- Diluted bleach should be made daily.

For additional information:

<https://www.who.int/emergencies/diseases/novel-coronavirus-2019>

Cleaning Public Areas

- Hand hygiene is the most important method to prevent the transmission of the influenza virus.
- Normal facility cleaning procedures for environmental surfaces should be followed using standard cleaning products. During a local outbreak, surfaces that

are frequently touched with hands such as sinks, doorknobs, railings and counters may be added to cleaning schedule in place of floor care.

- Individual employees and students may want to consider regular cleaning of their phones and keyboards particularly if they are shared with others or used by the public.
- There is no evidence to support the efficacy of widespread disinfection of the environment or air. Widespread application or spraying of disinfectants is an unsafe practice and must be avoided.
- Gloves should be worn when handling waste or waste containers.

Use of Disinfectants

- If a disinfectant is used, it should be an EPA-registered product with label claims as an influenza disinfectant.
- Routine use of bleach should be avoided as it is corrosive to metals, damaging to environmental surfaces, is inactivated by organic matter, has no detergent (cleaning) benefit and is toxic.
- Personal protective equipment should be worn when applying cleaning products. This includes gloves as well as goggles if splashing or spraying is possible.
- Campus Operations should be consulted before applying disinfectants in large quantities or in enclosed areas.

Center for Disease Control:	Pandemic Severity Index		
Interventions by Setting	1	2 and 3	4 and 5
Home Voluntary isolation of ill at home (adults and children); combine with use of antiviral treatment as available and indicated	Recommend	Recommend	Recommend
Voluntary quarantine of household member in home with ill person (adults and children); consider combining with antiviral prophylaxis if effective, feasible, and quantities sufficient	Generally, not recommended	Consider	Recommend
School Child social distancing <ul style="list-style-type: none">• Dismissal of students from schools and school-based activities, and closure of childcare programs• Reduce out-of-school social contacts and community mixing	Generally, not recommended	Consider: ≤4 weeks	Recommend: ≤12 weeks
	Generally, not recommended	Consider: ≤4 weeks	Recommend: ≤12 weeks
Workplace/Community Adult social distancing <ul style="list-style-type: none">• Decrease number of social contacts (e.g., encourage teleconferences, alternatives to face-to-face meetings)• Increase distance between persons (e.g., reduce density in public transit, workplace)	Generally, not recommended	Consider	Recommend
	Generally, not recommended	Consider	Recommend

<ul style="list-style-type: none"> • Modify, postpone, or cancel selected public gatherings to promote social distance (e.g., postpone indoor stadium events, theatre performances) 	Generally, not recommended	Consider	Recommend
<ul style="list-style-type: none"> • Modify workplace schedules and practices (e.g., telework, staggered shifts) 	Generally, not recommended	Consider	Recommend