

COVID-19 WORKPLACE PREPAREDNESS AND RESPONSE PLAN

In accordance with State of Michigan requirements, West Michigan Aviation Academy (“Academy”) institutes this COVID-19 Workplace Preparedness and Response Plan (“Plan”).

The Academy aims to protect its workforce by enacting all appropriate prevention efforts. The Academy is continually monitoring guidance from local, state, and federal health officials and implementing workplace and Plan modifications where appropriate. The Academy will provide any communication and training materials on COVID-19 in the languages that are common to its employee population.

Staff members with questions about this plan are encouraged to contact the School Leader via phone at 616-446-8886 and/or e-mail at ngasper@westmichiganaviation.org.

The Academy designates the following worksite supervisors/staff members to implement, monitor, and report on this Plan: Lawrence Fisher & Betsy Pott. Company will designate additional individuals as needed.

This Plan is maintained and posted www.westmichiganaviation.org

The Academy will consider any other social distancing practices, mitigation measures and guidelines recommended by the Centers for Disease Control and Prevention (CDC)-

Interim Guidance for Administrators of US K-12 Schools and Child Care Programs found at <https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/guidance-for-schools.html>

Reopening Guidance for Cleaning and Disinfecting Public Spaces, Workplaces, Businesses, Schools, and Homes found at- <https://www.cdc.gov/coronavirus/2019-ncov/community/reopen-guidance.html>

For Academies offering food distribution, the Academy will follow Michigan Department of Education guidance found at https://www.michigan.gov/mde/0,4615,7-140-66254_34491_96106-523138--,00.html

Additionally, the Academy will also comply with any and all applicable county health orders applicable to the specific site and Executive Orders from the Governor.

Definitions: Throughout this document, the “principal symptoms of COVID-19” are (i) any one of the following not explained by a known medical or physical condition: fever (100.4 degrees Fahrenheit or more), an uncontrolled cough, shortness of breath; or (ii) at least two of the following not explained by a known medical or physical condition: loss of taste or smell, muscle aches (“myalgia”), sore throat, severe headache, diarrhea, vomiting, abdominal pain. “Close contact” means being within six feet of an individual for fifteen minutes or more.

1. Prevention Efforts and Workplace Controls

a. Cleanliness and Social Distancing

During this Pandemic, staff members who are able to perform their essential duties remotely may be permitted to work from home in accordance with approved telework arrangements. The Academy limits the number of staff members present on premises and the movement of staff members between work sites to no more than is strictly necessary.

Only staff performing necessary government activities, or workers permitted by Executive Order to resume duties, are directed to report on-site. For such staff, the Academy abides by the recommended social distancing and other safety measures and establishes the following:

- Gatherings where social distancing cannot be maintained are prohibited;

- Staff meetings are completed remotely or in accordance with current health guidance;
- Staff members are encouraged to maintain physical distance even when on break, as well as before and after working hours;
- Staff members' work stations are no fewer than six feet apart whenever possible;
- The Academy may utilize flexible work hours, wherever possible, to limit the number of staff members simultaneously working on-site;
- Staff members' interactions with the general public and delivery personnel are modified to allow for social distancing and additional physical space between parties; and
- Non-essential travel is postponed or cancelled.

The Academy provides staff members with, at a minimum, non-medical grade face coverings.

In addition, the Academy is instituting the following cleanliness measures:

- Where possible, increasing ventilation rates and circulation throughout work sites;
- Performing routine environmental cleaning and disinfection, especially of common areas; and
- Where available, providing hand sanitizer in high-traffic areas.

Staff members are expected to minimize COVID-19 exposure by:

- Staying home if you are sick;
- Complying with the Academy's site entry procedure;
- Complying with the posters, signs and floor markers about health precautions;
- Cleaning work stations at least twice daily (at the beginning and end of each shift at minimum);
- Staying 6 feet apart whenever possible;
- Avoiding, when possible, the use of other staff members' phones, desks, offices, or other work tools and equipment;
- Washing hands frequently with soap and water for at least 20 seconds;
- Discontinuing the use of hand dryers;
- Utilizing alcohol-based hand sanitizer containing at least 60% alcohol when soap and water are unavailable;
- Avoiding touching their faces with unwashed hands;
- Avoiding handshakes or other physical contact;
- Avoiding close contact with sick people;
- Practicing respiratory etiquette, including covering coughs and sneezes;
- Immediately reporting unsafe or unsanitary conditions on the Academy premises;
- Seeking medical attention and/or following medical advice if experiencing COVID-19 symptoms;
- Complying with self-isolation or quarantine orders and
- Utilizing personal protective equipment and hand sanitizer on public transportation.

Staff are trained on the information contained within this plan and any other requirements as established by executive order. Non-compliance with this plan and COVID-19 procedures may result in discipline up to and including termination.

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

A staff member with a COVID-19 diagnosis or who displays symptoms consistent with COVID-19 must be immediately removed from the worksite. Staff members with symptoms should be tested for COVID-19 within 24 hours and the test result should be sent to Human Resources.

In response to a confirmed or presumed diagnosis of COVID-19 symptoms, the Academy:

- Informs all staff members and visitors who may have come into contact with the diagnosed staff member in the 48 hours preceding the onset of symptoms of a potential exposure;
- Keeps confidential the identity of the diagnosed staff member unless permission has been given by that staff member;
- Implements its response plan; and
- Conducts cleaning and disinfecting protocols, including shutting down appropriate areas of the premises, increasing ventilation, and conducting a deep cleaning of the diagnosed staff member’s workstation and those common areas potentially infected by the staff member.

All staff members who worked in sustained, close proximity to the diagnosed staff member (i.e., those staff members who worked within six feet of the diagnosed individual for at least fifteen minutes) in the 48-hour timeframe prior to the principal symptoms of COVID-19 are also removed from the worksite for at least fourteen (14) days however, should these exposed staff members later develop the principal symptoms of COVID-19 and/or receive a confirmed diagnosis, they may not report on-site until all return-to-work requirements are met, defined below.

A log of diagnosed/symptomatic employees will be maintained confidentially. Within 24 hours of a confirmed COVID-19 diagnosis, the local public health department will be notified. In addition, documentation related to exposure notifications will be maintained.

The Academy notifies their HR Manager to determine if an OSHA Form 300, as well as a Form 301, “if it is more likely than not that a factor or exposure in the workplace caused or contributed to the illness” needs to be completed. If a staff member infects a coworker, the coworker has suffered a work-related illness if one of the recording criteria (e.g., medical treatment or days away from work) is met.

c. Worker Exposure Classification

Staff members’ “worker exposure” is classified as medium risk by the Occupational Safety and Health Administration’s (OSHA) guidance because they frequently and/or closely interact with the general public.

Given this classification, the Academy provides the following controls in addition to the above summarized prevention installing physical barriers where feasible, limiting exposure to the general public, and minimizing face-to-face contact.

2. Identification and Isolation of Sick and/or Exposed Staff members

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

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

a. Staff members’ Self-Monitoring and Daily Screenings

Staff members should **not** report to work on-site and should notify their Supervisor if they can answer yes to any of the questions below. Such staff members may only resume in-person work upon meeting all return-to-work requirements, defined below.

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

Staff members are asked the following questions before entering the worksite:

1. In the past 24 hours, have you experienced any of the principal symptoms of COVID-19?:
 - a) Any one of the following not explained by a known medical or physical condition: fever (100.4 degrees F or more), an uncontrolled cough, shortness of breath; or
 - b) At least two of the following not explained by a known medical or physical condition: loss of taste or smell, muscle aches (“myalgia”), sore throat, severe headache, diarrhea, vomiting, abdominal pain.

If a touchless thermometer is available, temperature checks may be performed.

If the person answers “yes” to any of these symptoms and they are not due to an existing condition, then access is denied, and staff member is advised to self-isolate/self-quarantine at home. Staff member may only resume in-person work upon meeting all return-to-work requirements, defined below.

2. Have you tested positive or are considered presumptive positive for COVID-19 by a medical professional in the past 14 days?
 - a. If yes, access is denied, and staff member is advised to self-isolate/self-quarantine at home. The Academy will contact the local health department and receive advice on next steps. Staff member may only resume in-person work upon meeting all return-to-work requirements, defined below.
3. Have you lived with, or had close contact with, someone that is presumed or confirmed positive for COVID-19 in the past 14 days (within six feet of the diagnosed individual for at least fifteen minutes)?
 - b. If yes, access is denied. The Academy will contact the local health department and receive advice on next steps. Staff member may only resume in-person work upon meeting all return-to-work requirements, defined below.
4. Have you traveled internationally in the past 14 days?
 - a. If yes, then access is denied, and staff member is advised to self-isolate/self-quarantine at home, until at least 14 days after the international travel. Staff member may only resume in-person work upon meeting all return-to-work requirements, defined below.

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

Staff members who develop any of the principal symptoms of COVID-19 during their shift must immediately leave the site and report it to their supervisor.

b. Return-to-Work Requirements

Staff members who answered positive to question number 1 may return to work if the staff member is ill with mild symptoms that improved in a short period of time AND that person has tested negative for COVID-19. They do not have to continue to stay at home for the 10 full days after symptoms begin.

Staff members who test positive for COVID-19 may discontinue isolation and return to work upon achieving the following conditions:

- At least 10 days have passed since symptom onset or since they were swabbed for the test that yielded the positive result;

- At least 24 hours have passed since resolution of fever without the use of fever-reducing medications;
AND
- Other symptoms have improved.

Staff members who came into close contact with, or live with, an individual with a confirmed diagnosis or the principal symptoms of COVID-19 may return to work after either 14 days have passed since the last close contact with the diagnosed/symptomatic individual; or the diagnosed/symptomatic individual receives a negative COVID-19 test; or the staff member has received clearance from the local health department. If the staff member develops the principal symptoms while in quarantine, they must then revert to the 10 days past symptoms; 24 hours without fever without the use of fever-reducing medications; and other symptoms have improved requirements.

Staff members who have traveled internationally must self quarantine for 14 days unless they have received clearance from the local health department. If the staff member develops the principal symptoms while in quarantine, they must then revert to the 10 days past symptoms; 24 hours without fever without the use of fever-reducing medications; and other symptoms have improved requirements.

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

Staff members may be eligible for paid and unpaid leaves of absence.

Staff members may be permitted to work from home in accordance with approved telework arrangements.

a. Executive Orders

Staff members who require leave because of their own COVID-19 diagnosis/symptoms, or because they have had close contact or live with an individual with a COVID-19 diagnosis, may be eligible for unpaid leave under Executive Orders until permitted thereunder to return to work.

b. Unemployment Compensation Benefits

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

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

1. Being under self-isolation or self-quarantine in response to elevated risk from COVID-19 due to being immunocompromised;
2. Displaying at least one of the principal symptoms of COVID-19;
3. Having close contact in the last 14 days with a confirmed COVID-19 diagnosis;
4. Needing to care for someone with a confirmed COVID-19 diagnosis; and
5. Fulfilling a family care responsibility as a result of a government directive (e.g., caring for a child whose school or childcare provider is closed or otherwise unavailable due to COVID-19).

c. FMLA and ADA

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

The Academy is also mindful of its obligations under the Americans with Disabilities Act (“ADA”). Specifically, if a staff member requests an accommodation because of a condition that may be complicated by COVID-19 (e.g., cystic fibrosis, emphysema, COPD), then the Academy engages in the interactive process to provide a reasonable

accommodation. This may mean allowing the staff member to work remotely (if reasonable) or work an alternative schedule.

4. Plan Updates and Expiration

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

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