The purpose of this plan is to outline the steps that every staff member, trainee and visitor can take to reduce the risk of exposure to COVID-19. The plan describes how to prevent exposure to coronavirus COVID-19, protective measures to be taken at the Institution, personal protective equipment, and hands-on training practice controls to be used, cleaning and disinfecting procedures, and what to do if a staff member or trainee becomes sick.

Finishing Trades Training Institute of the Mid Atlantic Region takes the health and safety of our staff and trainees very seriously. With the spread of the coronavirus or “COVID-19,” a respiratory disease caused by the SARS-CoV-2 virus, we all must remain vigilant in mitigating the outbreak. This is particularly true for training institutes supporting the construction industry, which has been deemed “essential” during this Declared National Emergency. In order to be safe and maintain operations, we have developed this COVID-19 Plan for Finishing Trades Training Institute of the Mid Atlantic Region to be implemented throughout the main campus and at all our training locations. We have also designated a COVID-19 officer (FTI-MAR’s Health and Safety Manager) to monitor available U.S. Center for Disease Control and Prevention (“CDC”), Occupational Safety and Health Administration (“OSHA”), and state and local health department guidance on the virus.

This Plan is based on currently available information from the CDC and OSHA and is subject to change based on further information provided by the CDC, OSHA, and other public officials. The FTI-MAR may also amend this plan based on operational needs.

I. Responsibilities of the Director, Coordinators, Instructors and Administrative Staff

The Director, Coordinators, Instructors and Administrative Staff must be familiar with this plan and be ready to answer questions from trainees and visitors. The Director, Coordinators, Instructors and Administrative Staff must always set a good example by following this Plan. This involves practicing good personal hygiene and workplace safety practices to prevent the spread of the virus.

The following precautions are mandatory for the entire FTI-MAR staff until further notice:
• Proper coughing and sneezing etiquette must be followed. Cough or Sneeze into your elbow or a tissue if available.

• A face covering shall be worn at all times while a staff member is in a common area. (The following are examples of common areas: hallways, break rooms, classrooms, bathrooms, shops etc.)

• A face covering shall be worn at all times while operating an FTI-MAR vehicle.

• Personal offices are strictly limited to one occupant. If more than one individual must occupy the same office, then face coverings shall be worn by all occupants.

• Maintain personal wellness. Be aware of body temperature and highly receptive to any flu like symptoms you may be experiencing.

• If you have a fever or any symptoms, STAY HOME!

• Stay up to date with the current governmental and CDC guidelines found here: [CDC.gov](https://www.cdc.gov)

• If you have come into contact with an individual who has tested positive for COVID-19 please inform the Director of Training.

• Continue to maintain personal wellness. A digital thermometer will be available for all FTI-MAR staff.

• If you begin to feel ill, report any symptoms you develop to the Director of Training immediately.

• Consistently wash your hands or use the hand sanitizer located in the hallways.

• Practice social distancing whenever possible.

• When social distancing is unachievable, at a minimum, cover nose and mouth with a cloth mask, wear safety glasses and a face shield. It is preferable to wear a N95 respirator or greater if available.

• Do not share supplies like pens, staplers, thumb drives etc.
• Disinfect shared equipment between uses. Examples: Copy machines, postage machine, shredder, etc.

• The office area will be continuously cleaned and disinfected. Special attention will be given to frequently touched areas such as door knobs and light switches.

• Hand sanitizer will be constantly available for all employees.

• All bathrooms will be limited to 1 occupant at a time.

• All break rooms will be limited to 1 occupant at a time.

II. Responsibilities of Trainees

We ask every one of our trainees to practice required prevention efforts while at the training institute. In order to minimize the spread of COVID-19, we all must play our part. As set forth below, the training institute has established various housekeeping, social distancing, and other best practices at all our training locations. All trainees must follow these. In addition, trainees are expected to report to the training institute’s Director, Coordinators, or Instructors if they experience signs or symptoms of COVID-19, as described below. If you have a specific question about this Plan or COVID-19, please ask the training institute’s Director, Coordinators, or Instructors. If they cannot answer the question, please contact the FTI-MAR’s Health and Safety Manager Steve Metzger.

OSHA and the CDC have provided the following control and preventative guidance to all trainees, regardless of exposure risk:

• Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand sanitizer with at least 60% ethanol or 70% isopropanol.

• Avoid touching your eyes, nose, or mouth with hands.

• Follow appropriate respiratory etiquette such as:
  ✓ cover your mouth and nose with a tissue when you cough or sneeze;
  ✓ throw used tissues in the trash;
  ✓ if you do not have a tissue, cough, or sneeze into your elbow, not your hands and
  ✓ bend your arm, and make sure you sneeze into, not over, your elbow.

• Immediately wash your hands after blowing your nose, coughing, or sneezing.

• Avoid close contact with people who are sick.

• Maintain at least six (6) feet physical distance while in shared spaces.
In addition, trainees must familiarize themselves with the symptoms of COVID-19:

- coughing;
- fever;
- shortness of breath, difficulty breathing; and
- early symptoms such as chills, repeated shaking with chills, muscle pain, sore throat, new loss of taste or smell and headache.

If you develop a fever and symptoms of respiratory illness, such as cough or shortness of breath, DO NOT COME TO THE FTI-MAR and call your healthcare provider right away. Likewise, if you come into close contact with someone showing these symptoms, call your healthcare provider right away.

**III. Responsibilities of Visitors**

- Visitors are required to wear a face covering at all times.
- No outside visitors will be allowed on the Philadelphia Campus without written or verbal approval from the Director of Training. This includes but is not limited to part-time instructors, apprentices, and journeypersons.
- The number of visitors to the FTI-MAR will be limited to only those necessary to the Institute’s mission.
- All visitors will be screened before entering the FTI-MAR. If the visitor answers “yes” to any of the following questions, he/she should not be permitted to access the building:
  - √ Have you been confirmed positive for COVID-19?
  - √ Are you currently experiencing, or recently experienced, any acute respiratory illness symptoms such as fever, cough, or shortness of breath?
  - √ Have you been in close contact with any persons who has been confirmed positive for COVID-19?
  - √ Have you been in close contact with any persons who have traveled and are also exhibiting acute respiratory illness symptoms?
  - √ The FTI has the right to remove any individual who does not meet safety requirements.
FTI-MAR deliveries will be permitted but should be properly coordinated in line with the training institute's minimal contact and cleaning protocols. Delivery personnel should remain in their vehicles when practical.

IV. Training Institute Protective Measures

The FTI-MAR has established the following protective measures at all training locations.

A. General Safety Policies and Rules

- Prior to beginning training, trainees will be briefed on the new exposure controls and class expectations for conducting training.

- The FTI-MAR will provide soap, running water, and single use towels for frequent handwashing and will ensure they are replenished throughout the training day. When soap and water are not available, alcohol-based hand sanitizers with greater than 60% ethanol or 70% isopropanol will be provided.

- Any trainee/visitor showing symptoms of COVID-19 will be asked to leave the FTI-MAR and return home.

- In order to provide proper notification and to disinfect effected areas, a trainee/visitor who shows symptoms while at FT-MAR campus will be requested to share the results of their COVID 19 test with an FTI staff member.

- During all in-person training classes, avoid gathering in groups of more than 10 people and trainees must remain at least six (6) feet apart. In-person training sessions will be limited by the available classroom size to maintain social distancing. Classroom seating will be arranged to ensure trainees maintain at least six (6) feet between each trainee.

- The trainer station (desk, chair, workstation, etc.) will be located a minimum of six feet from the trainees.

- Trainees must avoid physical contact with others (No hand shaking, high-fives, or fist bumps) and direct others to increase personal space to at least six (6) feet, where possible.

- Attendance will be collected verbally, and the trainer will sign-in each trainee. Attendance will not be tracked through passed-around sign-in sheets or mobile devices.

- If tests, exams, assessments, etc. are administered, answer sheets will be placed on desk before trainees arrive. Trainees will grade themselves. Trainers will take
completed post-test with gloved hands and place in manila envelope. Paperwork should be quarantined for a minimum of 72 hours before being opened and filed.

- If self-grading of tests, exams, assessments, etc. is not allowed, trainers should establish a collection area where trainees will place their completed test, exam, assessment, etc. for grading. Trainees will maintain at least six (6) feet between themselves and other trainees as they approach/leave the collection area. Trainers will take the materials with gloved hands and grade each test, exam, assessment, etc. and record the score. Trainees can verbally be told if they passed or failed, or trainer can post grades, ensuring trainee anonymity, in the classroom. Trainers will take completed post-test with gloved hand and place in manila envelope. Paperwork should be quarantined for a minimum of 72 hours before being opened and filed.

- Trainee breaks and lunches will be staggered, if practicable, to reduce the size of any group at any one time to less than ten (10) people. Trainees will be released by seating rows to maintain social distancing. A distance of six (6) feet will be maintained during lunch and breaks.

- In lieu of using a common source of drinking water, such as a water fountain, cooler or bubbler, trainees should use/be provided individual water bottles.

- Trainees are encouraged to bring food from home and not share with others.

- If lunch is to be provided by the FTI-MAR, lunches should be prepared off site and individually packaged “box lunches.” No buffet style meals should be provided. Drinks should be in bottles or cans and sealed. If coffee is provided, a designated staff member at the FTI-MAR will prepare cups of coffee using food handling techniques and good hygiene eliminating the risk of multiple students using a single coffee pot.

- Trainees must clean their hands by washing them with soap and water for at least 20 seconds. When hand washing is not available, use an alcohol-based hand sanitizer with greater than 60% ethanol or 70% isopropanol. Soap and water should be used if hands are visibly dirty.

- Trainees shall clean their hands frequently, including before and after going to the bathroom, before and after eating, and after coughing, sneezing, or blowing their nose.

- The use of books, manuals, student guides, handouts, pens, pencils, highlighters, and markers should be eliminated where practical. If needed, they should be one-time use only. If books, manuals, student guides or other paper-based training materials need to be saved, trainers will take the materials with gloved hands and quarantine them for a minimum of 72 hours before being reused.

- Trainees should not use other trainees’ personal protective equipment (PPE) and training materials (i.e., manuals, pens, highlighters, notepads, etc.) and limit the use
of other trainees’ tools and equipment. To the extent PPE, tools and equipment must be shared, the FTI-MAR will provide alcohol-based wipes, or other disinfecting materials, to clean PPE, tools, and equipment before and after use. When cleaning PPE, tools, and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.

- Trainees are encouraged to not use ridesharing.
- One instructor will operate audio/visual equipment and will be responsible for cleaning the equipment at the end of class using a disinfecting wipe and gloved hand.
- All classroom-based props/demonstration materials will now be handled by the trainers. The trainer utilizing the prop/demonstration materials will be responsible to sanitize the prop/demonstration materials before and after each use.

**V. Workplace Cleaning and Disinfecting**

The FTI-MAR has established regular housekeeping practices, which includes cleaning and disinfecting frequently used Personal Protective Equipment (PPE), tools and equipment, and other elements of the training center environment, where possible.

- Office areas, classrooms, common areas, high contact surfaces, bathrooms and break/lunchroom areas will be cleaned at least once per day. Employees performing cleaning will be issued proper PPE, as recommended by the CDC.
- Trash collected from the Institution must be changed frequently by someone wearing nitrile, latex, or vinyl gloves.
- Vehicles and equipment/tools should be disinfected at least once per day and before change in operator or rider.
- If an FTI-MAR employee or trainee has tested positive for COVID-19, OSHA has indicated that there is typically no need to perform special cleaning or decontamination of work environments, unless those environments are visibly contaminated with blood or other bodily fluids. Notwithstanding this, the FTI-MAR will disinfect those areas of the training institution that a confirmed-positive individual may have come into contact with before training center staff and trainees can access that space again.

The FTI-MAR will ensure that any disinfection shall be conducted using one of the following:

- ✔ Common EPA-registered household disinfectant;
- ✔ Alcohol solution with at least 60% ethanol or 70% isopropanol; or
✓ Diluted household bleach solutions (these can be used if appropriate for the surface).

- The FTI-MAR will train employees on the hazards of the cleaning chemicals used at the Institution in accordance with OSHA’s Hazard Communication standard (29 CFR 1910.1200).

- The FTI-MAR will maintain Safety Data Sheets of all disinfectants used on site.

VI. FTI-MAR Exposure Situations

Trainee Exhibiting COVID-19 Symptoms

If a trainee exhibits COVID-19 symptoms, the trainee must remain away from the FTI-MAR until he or she is symptom free for fourteen (14) days without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants). The FTI-MAR will similarly require a trainee, that reports to the training center with symptoms, to return home until they are symptom free for fourteen (14) days.

FTI-MAR Employee Exhibiting COVID-19 Symptoms

If an FTI-MAR employee exhibits COVID-19 symptoms, the employee must remain at home until he or she is symptom free for fourteen (14) without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants). The FTI-MAR will similarly require an employee, that reports to work with symptoms, to return home until they are symptom free for fourteen (14). To the extent practical, employees are required to obtain a doctor’s note clearing them to return to work.

FTI-MAR Employee Tests Positive for COVID-19

An FTI-MAR employee that tests positive for COVID-19 will be directed to self-quarantine away from work. Employees that test positive and are symptom free may return to work when at least fourteen (14) days have passed since the date of his or her first positive test and have not had a subsequent illness. Employees that test positive and are directed to care for themselves at home may return to work when: (1) at least 72 hours (3 full days) have passed since recovery;¹ and (2) at least fourteen (14) days have passed since symptoms first appeared. Employees that test positive and have been hospitalized may return to work when directed to do so by their medical care provider. The FTI-MAR will require an employee to provide documentation clearing their return to work.

Trainee Has Close Contact with a Tested Positive COVID-19 Individual

¹ Recovery is defined as: (1) resolution of fever with the use of fever-reducing medications; and (2) improvement in respiratory symptoms (e.g., cough, shortness of breath).
Trainees that have come into close contact with a confirmed-positive COVID-19 individual, will be directed to stay away from the FTI-MAR for 14 days from the last date of close contact with the carrier. Close contact is defined as six (6) feet for a prolonged period of time.

**Training Center Employee Has Close Contact with a Tested Positive COVID-19 Individual**

Employees that have come into close contact with a confirmed-positive COVID-19 individual (co-worker or otherwise), will be directed to self-quarantine for 14 days from the last date of close contact with the carrier. Close contact is defined as six (6) feet for a prolonged period of time.

If the FTI-MAR learns that an employee has tested positive, the Institute will conduct an investigation into co-workers that may have had close contact with the confirmed-positive employee in the prior 14 days and direct those individuals that have had close contact with the confirmed-positive employee to self-quarantine for 14 days from the last date of close contact with the carrier. If an employee learns that he or she has come into close contact with a confirmed-positive individual outside of the workplace, he/she must alert the Director of the close contact and also self-quarantine for 14 days from the last date of close contact with the carrier.

**VII. OSHA Recordkeeping**

If a confirmed case of COVID-19 is reported by an employee, the FTI-MAR will determine if it meets the criteria for recordability and reportability under OSHA’s recordkeeping rule. OSHA requires employers to record work-related injuries and illnesses that meet certain severity criteria on the OSHA 300 Log, as well as complete the OSHA Form 301 (or equivalent) upon the occurrence of these injuries. For purposes of COVID-19, OSHA also requires employers to report to OSHA any work-related illness that (1) results in a fatality, or (2) results in the in-patient hospitalization of one or more employee. “In-patient” hospitalization is defined as a formal admission to the in-patient service of a hospital or clinic for care or treatment.

OSHA has made a determination that COVID-19 should not be excluded from coverage of the rule – like the common cold or the seasonal flu – and, thus, OSHA is considering it an “illness.” However, OSHA has stated that only confirmed cases of COVID-19 should be considered an illness under the rule. Thus, if an employee simply comes to work with symptoms consistent with COVID-19 (but not a confirmed diagnosis), the recordability analysis would not necessarily be triggered at that time.

If an employee has a confirmed case of COVID-19, the FTI-MAR will conduct an assessment of any workplace exposures to determine if the case is work-related. Work-relatedness is presumed for illnesses that result from events or exposures in the work environment unless it meets certain exceptions. One of those exceptions is that the illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside of the work environment. Thus, if an employee develops COVID-19 solely from an exposure outside of the work environment, it would not be work-related, and thus not recordable.
The FTI-MAR’s assessment will consider the work environment itself, the type of work performed, risk of person-to-person transmission given the work environment, and other factors such as community spread. Further, if an employee has a confirmed case of COVID-19 that is considered work-related, the Training Institute will report the case to OSHA if it results in a fatality within 30 days or an in-patient hospitalization within 24-hours of the exposure incident occurring.

VIII. Confidentiality/Privacy

Except for circumstances in which the FTI-MAR is legally required to report workplace occurrences of communicable disease, the confidentiality of all medical conditions will be maintained in accordance with applicable law and to the extent practical under the circumstances. When it is required, the number of persons who will be informed of an employee’s condition will be kept at the minimum needed not only to comply with legally-required reporting, but also to assure proper care of the employee and to detect situations where the potential for transmission may increase. A sample notice to employees is attached to this Plan. The FTI-MAR reserves the right to inform other employees that a co-worker (without disclosing the person’s name) has been diagnosed with COVID-19 if the other employees might have been exposed to the disease so the employees may take measures to protect their own health.

IX. General Questions

Given the fast-developing nature of the COVID-19 outbreak, the FTI-MAR may modify this Plan on a case by case basis. If you have any questions concerning this Plan, please contact the Director of Education.
Employee Notification

DATE: Date

TO: Close Contact Employee

FROM: Marty McNulty

We have been informed by one of our employee/trainee/vendor/etc. working/training/visiting at the FTI-MAR that he/she has a confirmed case of COVID-19, commonly known as “Coronavirus,” based on test results obtained on Date. Per training institute policy, this employee/trainee/vendor/etc. has been directed to self-quarantine until permitted to return to work or prohibited from entering the training institute until they provide documentation clearing their return.

We are alerting you to this development because, based on the FTI-MAR’s investigation, we believe that you may have come into contact with the confirmed-positive case, on or about Date. Based on training institute policy we are directing you not to report to work (i.e., self-quarantine) until, at least, 14 days from last contact with confirmed case. In the interim, we encourage you to seek medical advice and a COVID-19 test, especially if you are exhibiting symptoms of the virus.

If you do not test positive for COVID-19, or experience symptoms, by 14 days from last contact with confirmed case, you may return to work. However, please inform me if any of the following occur during your self-quarantine: you experience flu-like symptoms, including fever, cough, sneezing, or sore throat; or you test positive for COVID-19.

We are committed to providing a safe environment for all of our employees and a safe environment for our students. It is in the interest of those goals that we provide this information out of an abundance of caution.

We also want to take this opportunity to remind you that one of our core values as a training institute is respect for and among our employees. We will treat information regarding the identity of employees with suspected or confirmed cases of COVID-19 as confidential to the extent practicable and will comply with applicable laws regarding the handling of such information. Further, per FTI-MAR policy, we will not tolerate harassment of, or discrimination or retaliation against, employees or anyone.

My contact number is 267-246-0511, if you have any questions or concerns.

For more information about COVID-19, please visit the CDC website at: CDC.gov