



EMERGENCY PREPAREDNESS PLAN

DENVER

1401 Nineteenth Street
Denver, CO 80202

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Official Statement

The Emergency Preparedness Plan (EPP) that follows is the official policy of the Denver College of Nursing located in Denver, Colorado. 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 the Appendices.

Mr. Mikal Powers

Printed Name
College President



Signature

1/10/24

Date

Acknowledgement of Acceptance and Understanding

By signing below, I signify that I have had the opportunity to read the EPP 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. A copy of this signed statement is included in my personnel file.

Printed Name

Signature

Date

Introduction

The purpose of the Emergency Preparedness Plan (EPP) is to ensure the safety of students, faculty, staff, and visitors to Denver College of Nursing 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 / Distribution / Training

A signed acknowledgement is obtained from each faculty and staff member and students at the time of the initial distribution of the plan. This form is found at the beginning of the plan.

- A copy of the EPP is found in Teams > General folder and at least one physical copy can be found in the President's Office and the Office of the Dean of Nursing.
- A copy of the EPP is posted on Ignite to Learn
- The EPP is distributed to all faculty and staff during the on-boarding process. The Signed acknowledgement is placed in the personnel file.
- Faculty and staff receive in-service training/updates on an annual basis. Evidence of attendance: Sign-In sheets and Certificates in personnel files
- Students are trained on the Emergency Preparedness Plan during New Student Orientation and sign the acknowledgement that is placed in the student's academic file along with a copy of the Certificate of Attendance

Emergency Notification & 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.

College President	303-292-0015 ext 3626
Front Desk	303-292-0015
Dean of Nursing	303-292-0015 ext 3655
Business Office Manager	303-292-0015 ext 3621

Emergency Response Team

The school Emergency Response Team (ERT) 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 ERT shall include the College President, key management team members and associated personnel.

- Main Campus: One Director and one back-up will be assigned to cover these areas:
 - 2nd Floor
 - 1st Floor and Mezzanine
 - Entry and Basement
- Annex: President and Director of Business Operations will cover their respective sides.
One additional person will serve as a back-up

Risk Assessment

The ERP Team should conduct an initial Risk Assessment of the campus. This documentation should be maintained on campus and updated quarterly by the same team. Each year, an OSHA Assessment should be performed, and a copy kept on file in the Campus President's office. A template from OSHA or an agency such as SteriCycle may be used.

If possible, enlist the assistance of local law enforcement to conduct an assessment of risk that your school may have.

This Emergency Preparedness Plan cannot cover every possible situation 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 a situation develops. Time is a critical factor in the management of a situation of this manner.

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 must 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 in Florida, the hazard assessment would likely include identification of hurricanes & 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 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; 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. We 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:

Admission appointments, business and personal visitors, delivery and vendor personnel, former students, former employees, friends, and family including children, the public, and current students without an ID and/or in street clothes are defined as visitors.

Policy

The following apply for all visitors:

- Sign in at the reception desk and show some form of ID
- Sign in and out every time even if they are known by the front office
- Wear a visitor ID badge while on campus
- Return the badge upon leaving the campus
- On the sign-in sheet, indicate purpose of 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 w/o 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 Dean, 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 FA appointments, delivery, vendors may be accomplished by the department in charge providing a list to the Front Desk each morning or evening.

Unauthorized Visitors

The Front Office may ask any non-cooperative visitor to leave. If a visitor refuses to leave or is found in unauthorized areas without an ID will be asked to leave. Anyone encountering an issue with an unauthorized visitor should report to the front office 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

A sign must be posted at the entrance informing all visitors and students without an ID badge to check-in with the Front Desk.

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 emergency.

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 and Security team at: DHelpDesk@edaff.com. Our 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 location.

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

Closing of College for Inclement Weather

As a general rule, DCN follows the opening/closing schedule of public institutions.

- 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 College will be closed because of inclement weather by a member of the ERT.
- School closings will be posted on College’s website and/or student/Faculty portals.
- If possible, Faculty will notify students in their classes about closing of school through the use of cell phone or other appropriate means.
- Shut down all equipment properly; disconnect power sources to the equipment.
- Signs regarding the closing will be posted.
- Building Coordinator will secure the building.

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 caused by the severe weather.

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 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 inside hallways.
- Class Roll will be taken by the Faculty to insure everyone is present.
- ERT will go through the building to notify anyone who may not have heard the warning.
- No one will return to classrooms or offices until "All Clear" is announced by a member of the ERT.

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 ERT.
- If there is advance warning of a flood than 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 safer location.
- In addition, if the campus has a CDL program move the CDL fleet to a safe location.

- All occupants must leave the campus immediately and move to higher ground away from rivers, streams, creeks, and storm drains.

Severe Winter Snowstorms or Ice Storms

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 for the related procedures).

When a severe snowstorm or ice storm 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:

- 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. 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 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 ERT 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 Incident Coordinator, Campus President, Dean, or Zone Coordinator.

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.
- 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 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.

1. Stay calm. Information may be provided by the Emergency Response Team to assist answering questions and safe evacuation (if necessary).
2. Help persons 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 ERT should contact the corporate office, including the corporate vice presidents in charge of facilities and insurance. ERT should document in writing what happened using the EA Accident/Incident/Injury Report (available on the Intranet under the Human Resources section, a copy is also found in this Plan as Appendix 3) An assessment of damage to building, furniture and fixtures, and equipment should be undertaken. Photos should be taken of damage and damaged property should be preserved if possible. The landlord should be notified immediately and remediation of damage to building should begin quickly.

Damage/Injury Assessment After a Major Weather Event

- Meeting of the Emergency Response Team will be held after any major weather situation has occurred.
- Initial meeting may include representation from the appropriate county emergency office.
- Members of the ERT should be prepared to discuss how emergency procedures were or were not followed within their areas of responsibility.
- 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.
- ERT will assess the need to move classes from any damaged area.
- Depending on the severity of situation, school may be cancelled, and students and employees sent home until further notice (as per "Closing of College" section).

Violence

Purpose

It is the purpose of the EPP 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 such time that the weapon is discarded.

- All employees are required to report threats to a member of the ERT 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 Academic Dean 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 #'s 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 employees 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. Once all employees 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 should stop 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 their 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 for a form that should be completed if you receive a threat.

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, employees, with back up from members of the Emergency Response Team, shall ensure that:

- Rooms are evacuated in a calm and orderly manner;
- all 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 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.

- Main Building = Parking lot across 19th Street
- Annex = Parking lot across 19th Street

See Appendix 2 for maps

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 persons will be familiar with their immediate surroundings. In an emergency:

- Describe the nature of the emergency and offer to act as a “sighted guide” - 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 persons 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 Academic Dean

- 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.
- Emergency Notification System will be enacted to alert everyone of imminent threat.

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 moving 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 all persons 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 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.* 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

Denver College of Nursing is committed to providing a safe and healthful work environment for the entire staff. In pursuit of this goal, an exposure control plan (ECP) is 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 ECP is a key document to assist our organization 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.

Employees

Employees covered by the bloodborne pathogens standard receive an explanation of this during their initial training session. It will also be reviewed in their annual refresher training. All employees can review this plan at any time during their work shifts by contacting the EPC Coordinator or viewing in the LRC. If requested, we will provide an employee with a copy of the ECP within 15 days of the request.

Students

The Exposure Control Plan, universal precautions, personal protective equipment, bloodborne pathogens, hand washing, CPR, etc. are covered in introductory courses such as AHP101 or orientation. Certificates of completion are issued to each student.

Hazardous Materials/Communication Procedures

The management of Denver College of Nursing 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. They will ensure that procedures are developed to obtain the necessary SDSs and will review incoming SDSs for new or significant health and safety information. They will see that any new information is communicated to affected employees.

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 LRC. SDSs will be readily available to all employees during each work shift. If an SDS is not available, contact the SDS Coordinator.

A list is attached to this plan 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 Denver College of Nursing 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 will 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 work day. 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.

SDS's are readily available to all employees during their work shifts. Employees can review SDS for all hazardous chemicals used at this workplace. The SDS's specific to each department are available in the lab and are centrally located for all departments in the Dean of Education Office.

The SDS's 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 calling the Campus President who will either supply this information or will contact the authorized employee who has the required information.

Training Employees about Chemical Hazards

Before they start their jobs or are exposed to new hazardous chemicals, employees must attend a hazard communication training that covers the following topics:

- An overview of the requirements in OSHA's Hazard Communication Standard.
- Hazardous chemicals 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 we 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 this training. After attending the training, employees will sign a form verifying that they understand the above topics and how the topics are related to our hazard communication plan.

Prior to introducing a new chemical hazard into any department, each employee in that department will 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, their supervisors will inform them about the chemicals' hazards. Their supervisors also will 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 leave the area. Avoid breathing in fumes.
 - b. Employees exposed to fumes should seek medical treatment if necessary. ERT 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>Gas Cylinder</p>  <ul style="list-style-type: none"> ▪ Gases Under Pressure 	<p>Corrosion</p>  <ul style="list-style-type: none"> ▪ Skin Corrosion/Burns ▪ Eye Damage ▪ Corrosive to Metals 	<p>Exploding Bomb</p>  <ul style="list-style-type: none"> ▪ Explosives ▪ Self-Reactives ▪ Organic Peroxides
<p>Flame Over Circle</p>  <ul style="list-style-type: none"> ▪ Oxidizers 	<p>Environment (Non-Mandatory)</p>  <ul style="list-style-type: none"> ▪ Aquatic Toxicity 	<p>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 school's complete Pandemic/Influenza 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 is 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 COVID-19 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 COVID-19:

- Fever or chills
- Cough
- Shortness of breath or difficulty breathing
- Fatigue
- Muscle or body aches
- Headache
- New loss of taste or smell
- Sore throat
- 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 fac

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

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 (NPI's), 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 or Outbreak

The Campus President, along with other members of 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 infection control measures. This includes 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 45 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 on 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 assure continuity of instruction, 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 includes 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.

Support for Students

Faculty and technology support will be provided to all students and employees. Any student or employee that may need technology support will be provided such support through the Corporate IT Department. 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.

Extended Absences for Students

The pandemic situation 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 the pandemic 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 the pandemic situation.

Pandemic 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 to normal operations. This analysis will most likely be conducted on a state-by-state basis and even 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

The campus will maintain an emergency response kit in the Skills Lab. During an emergency the kit will be taken outside or to the appropriate area to have on-hand as needed. The kit contains:

- 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

Additional first aid kits are maintained at the front desk and in all labs.

It is also recommended that all staff and faculty members keep a personal emergency kit in their car.

The American Red Cross website located at <http://www.redcross.org/services/prepare> provides additional information on emergency kits for 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. Remain with the person with the medical emergency. Do not move the person unless they are in immediate danger of further injury.

When an employee or a student is injured a school supervisor should complete the EA Accident/Injury/Incident Report (available on the Intranet in the Human Resources section, and also in Appendix 3 of this Plan) and provide a copy to the corporate VP of Treasury Operations. Any witnesses to accidents should provide written statements to document what happened. The school must report employee injuries to EA's 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 EA VP 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 **Corporate Office** 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. If there are no "alarm" systems located in the building, 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 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 their 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 (EPP)
- Conduct training exercises regularly
- Together, the EPP and training exercises prepare the staff 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 faculty/staff orientation.
- Documentation of attendance and acceptance must be maintained.
- The Emergency Preparedness plan is placed on My Campus Link 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
- OSHA Training Policy – see Appendix 6 for an example
- VTA course once developed

Training During the COVID-19 Pandemic

Due to the unforeseen circumstance related to the COVID-19 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 complete Pandemic/Influenza plan).

Any training must be documented. See Appendix 7: Training and Testing Tracking sheet.

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. For this purpose, critical records are defined as:

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

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, Denver College of Nursing uses the Campus Vue Student Data Management system to notify students of an impending emergency. Recently, Denver College of Nursing

obtained a new and innovative student portal and notification system called Campus. Our IT Department is currently restructuring the entire IT system to better serve our students. This new notification system will be implemented tentatively by February 1, 2021 and will replace the previous notification delivery method. Current students will have their data transferred to the new system and will be notified of enrollment when this occurs. New students will automatically be enrolled during the enrollment and orientation process. A mobile phone application can also be downloaded by students, faculty, and staff. These emergency notifications will be sent via text, e-mail, and by a push notification through the mobile application (if downloaded on the mobile phone). Please understand that standard text message rates apply as pre-determined by your mobile phone provider. 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 e-mail addresses and mobile phone numbers registered with the notification system. If you have downloaded the application on your mobile phone and are enrolled, you 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 management team, will determine the content of the notification.

A test of the Emergency Notification System is conducted annually. A log will be kept of the date and time of the test. This information is kept with the Compliance Department. Due to the COVID-19 Flu Pandemic, the testing of this notification system will not resume until the normal operations of the campus resumes. Testing of this system is expected to be completed within 12 weeks of the campus resuming normal operations and implementing the new system.

Closure/Opening of School

- Each supervisor should have a list readily available of their subordinates' phone numbers and addresses. It is the supervisor's responsibility to contact their employees with work status updates if evacuation and/or shut down of the school's operation are necessary.
- Faculty should have a list of students and contact the students when feasible of school closure.
- If a TV or radio station is used for closure announcements, this information must be provided to the students during 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 Denver College of Nursing website and student portal will be utilized as key mediums for updating our campus community and the public on the details of the emergency and actions we are taking to address all related issues. In 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 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. The School reserves the right to amend, modify and change this EPP, and will provide notice as practical. In the case of a situation which is continuing, such as a pandemic, this EPP 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 Incident Report Form, and filed as directed by the Campus President (See Appendix 3: Injury/Incident 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 signal to alert other personnel to listen to the caller also. If possible, advise the caller that the detonation of a bomb could maim or injure innocent people.

Threat Checklist

Complete this list if you receive a threat.

Exact time of call: _____ Date: _____

Phone Number on the Caller ID: _____

Exact words of caller:

Call received by: _____

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) threat.||

Give school name and address.

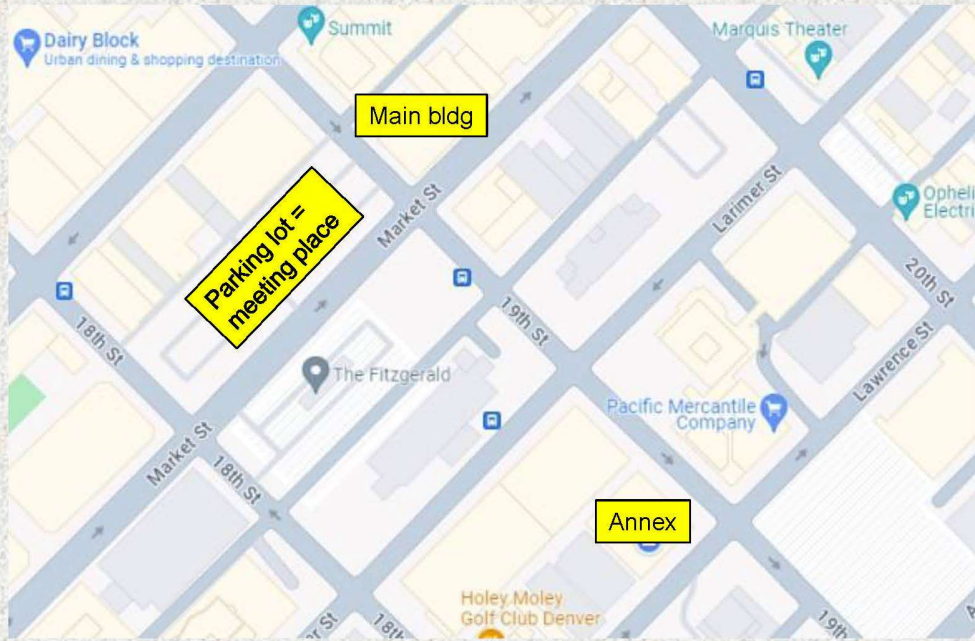
REMAIN CALM!




Appendix 2: Emergency Evacuation Maps

Each room in the building has a map with evacuation directions.

Below are general maps of the area and each floor for both the Main building and the Annex.

In case of evacuation from either campus location =
Meeting place is in parking lot across from main campus (off Market between 18th and 19th streets)



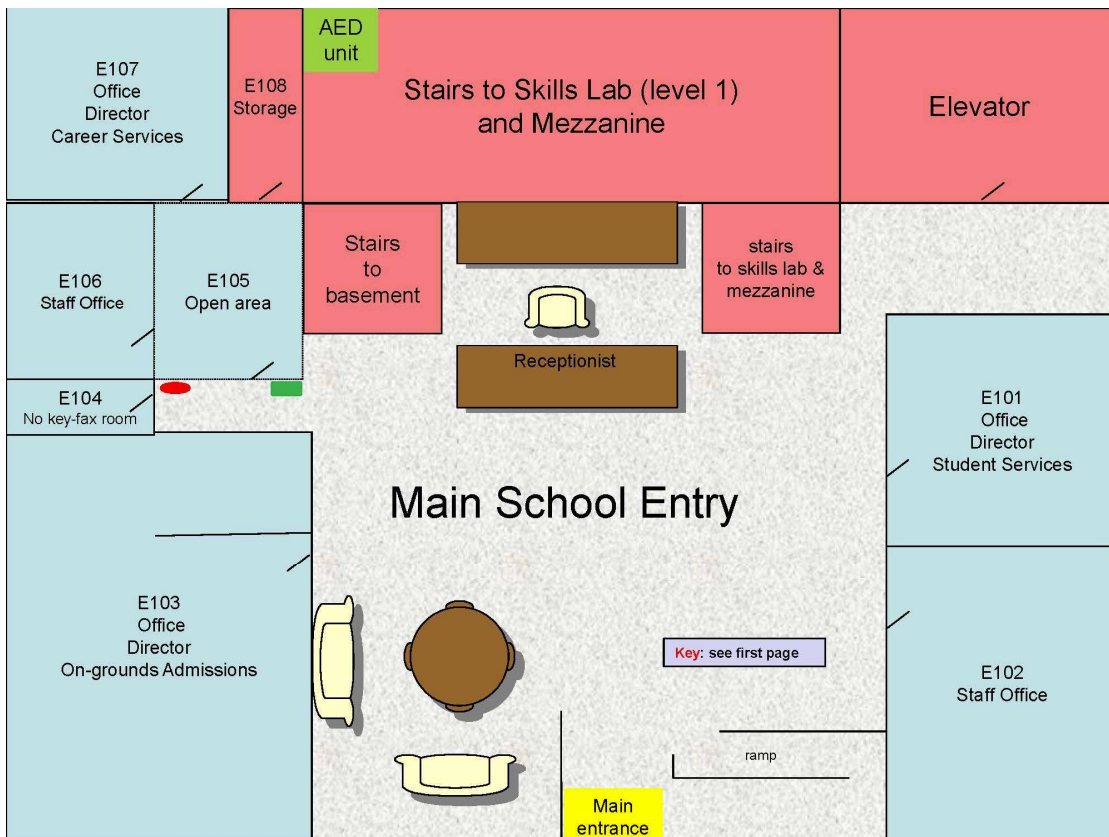
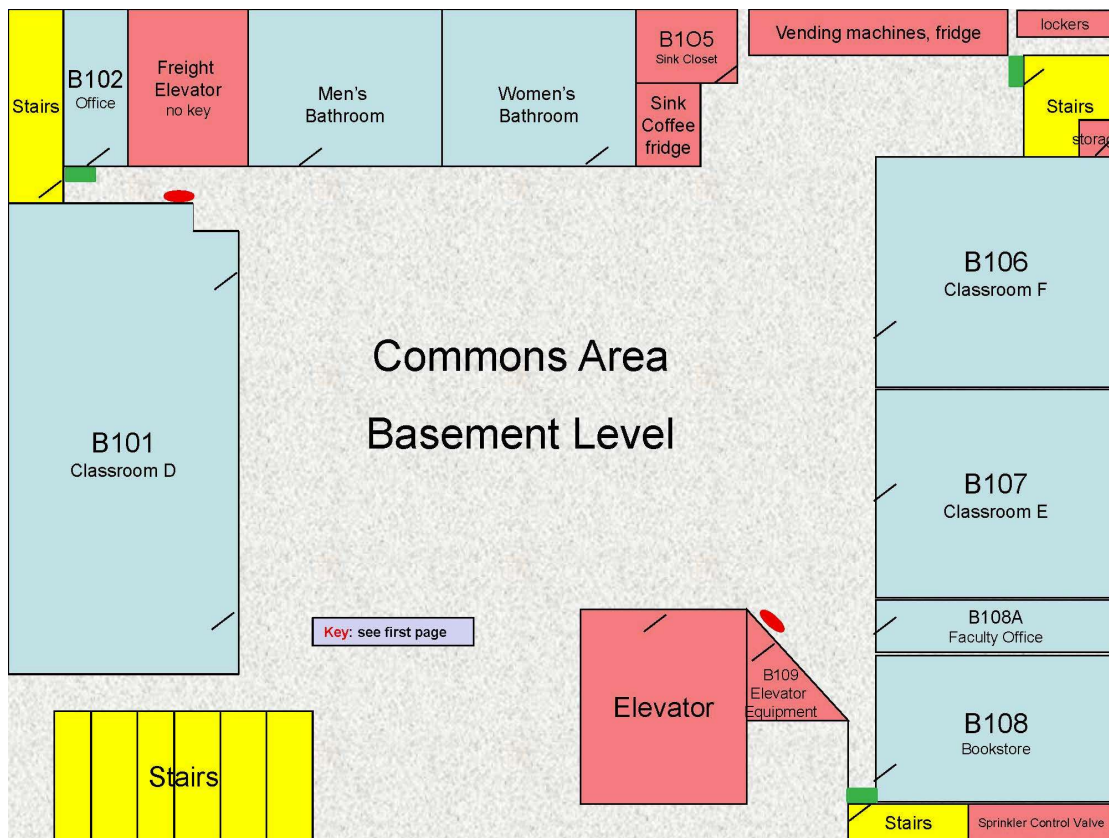
Key:
Evacuation routes = yellow highlight area
Doors = 
Fire extinguisher = 
Fire alarm (pull down) = 
Also found = AED unit and eye wash stations (labeled in green boxes)

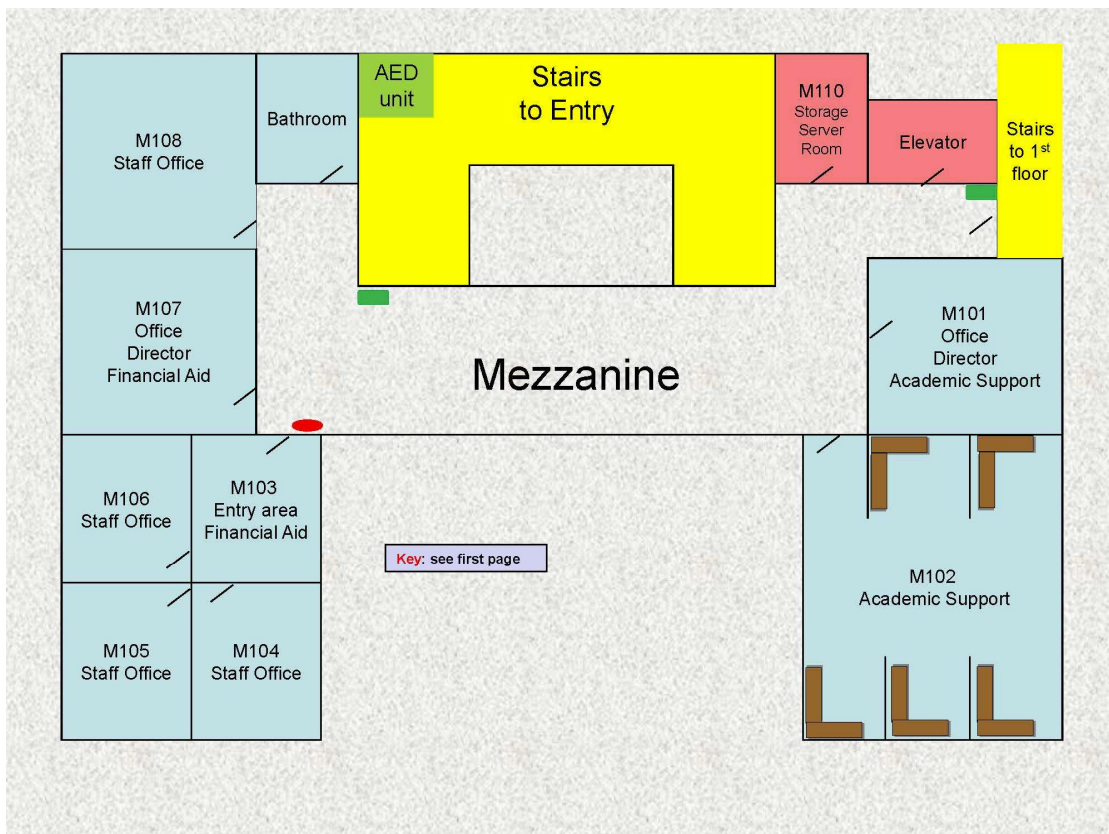
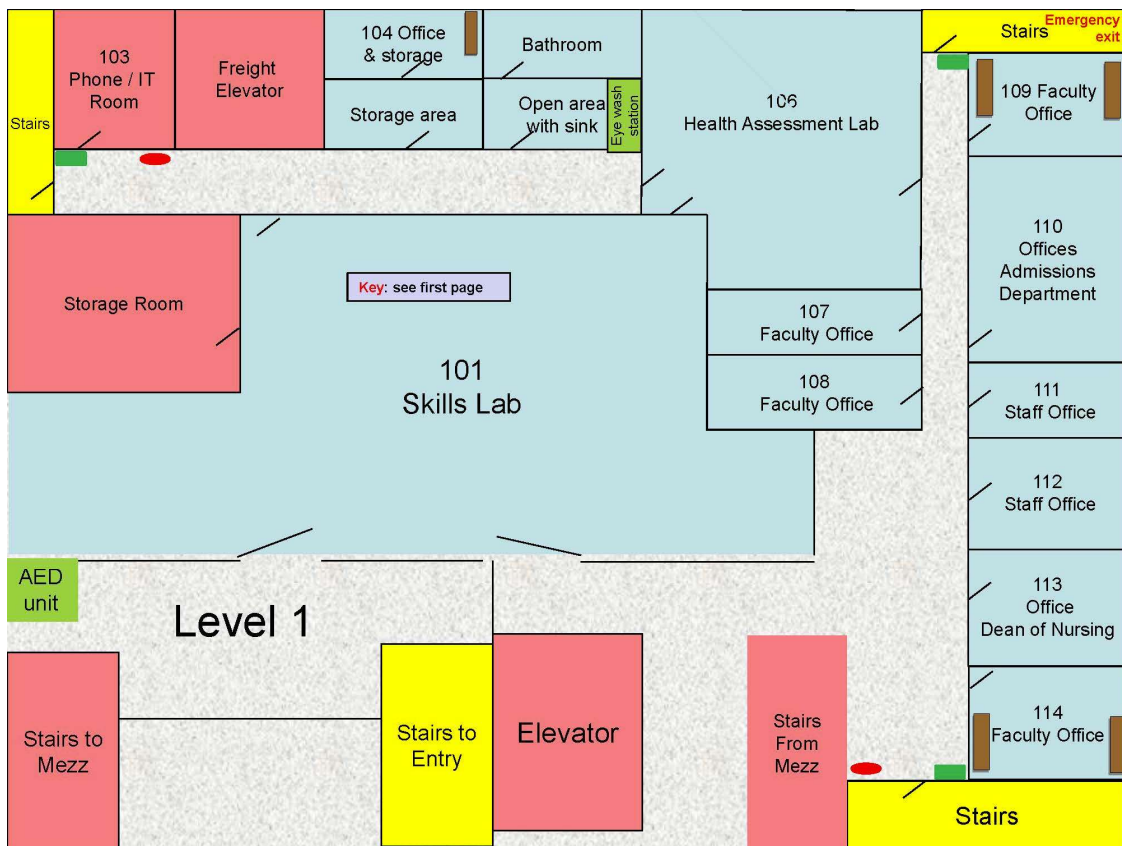
DCN – Main Campus (1401 19th Street) and Annex (1875 Lawrence Street) Floor Plans Denver, CO 80214

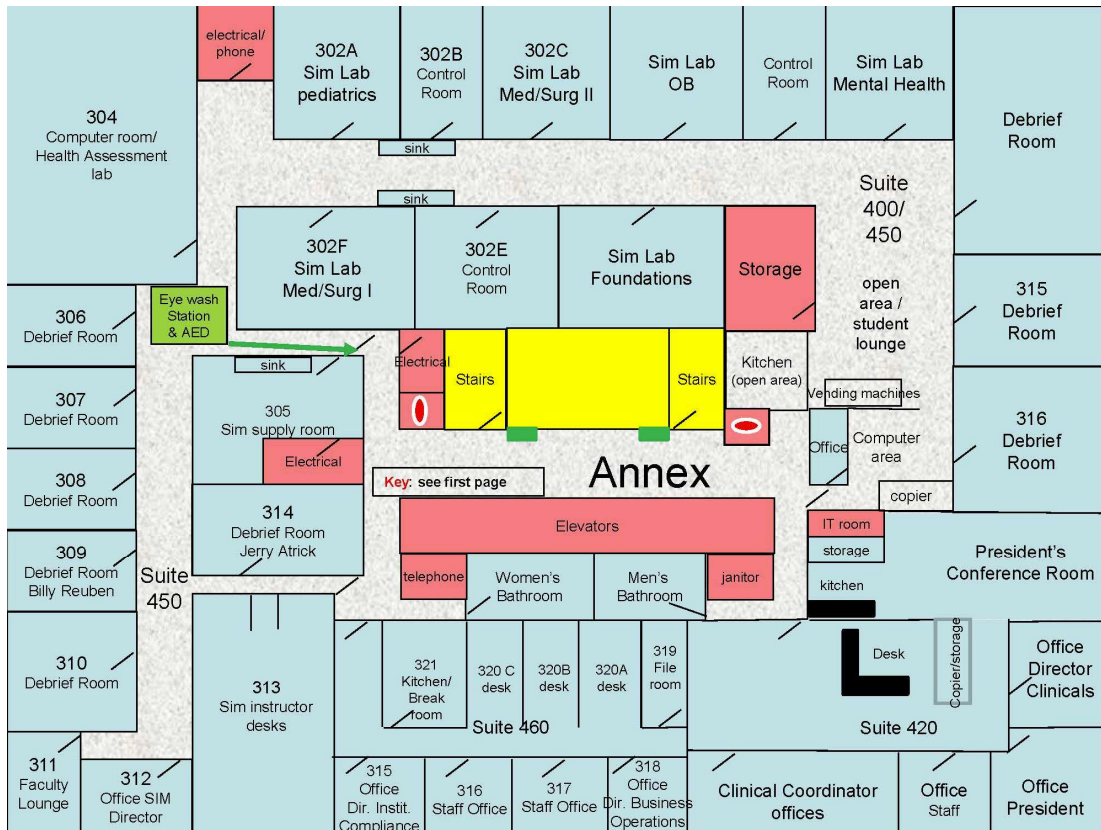
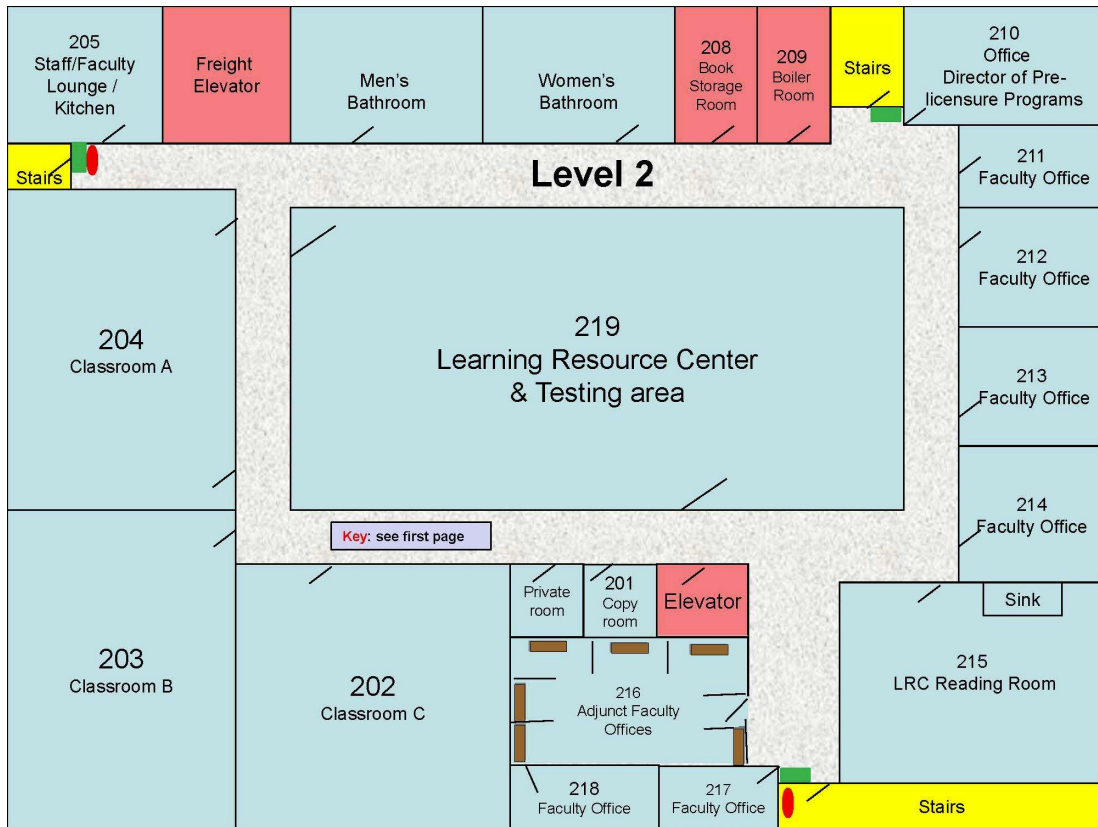
Departments/Areas – general overview

- **Basement:** classrooms, bookstore, Student Commons
- **Entry:** On-ground Admissions, Student Services, Career Services
- **1st Floor:** Skills Lab, Health Assessment Lab, Online Admissions, faculty offices
- **Mezz:** Financial Aid, Academic Support
- **2nd Floor:** classrooms, LRC, faculty offices
- **Annex suite 420:** Office of the President, Clinical Department
- **Annex suite 450:** Sim Lab, Sim instructor offices
- **Annex suite 460:** Business / Financial Office, IT

Updated Nov 2024







Appendix 3: Injury/Incident 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 _____

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 Corporate Office
- () 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 situation, 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 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 required of all employees at Denver College of Nursing College.

New Hires

Regardless of the department or position, any new hire is required to complete the Virtual Training Academy on Demand Training Course, [OSHA](#) and to meet briefly with the OSHA Coordinator.

Additional VTA courses required at time of hire are:

- New Employee Orientation
- Title IX/VAWA Training
(Title IX/VAWA Training is required for all EA employees to complete on an annual basis)

Employees

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

Category 1

New Faculty with daily exposure to bloodborne pathogens and hazardous chemicals and who teach in a lab where students use related equipment in the process of learning are to receive OSHA training prior to teaching in a laboratory. Documentation of the training is to be placed in the faculty personnel file. *The course on VTA will meet this requirement for new faculty.*

All Faculty, regardless of exposure, are required to attend an on-site OSHA training update on an annual basis. If a faculty member cannot do so, (s)he is required to complete an online training approved by the OSHA Coordinator and to attend a make-up session with the OSHA Coordinator. The update must be completed within two weeks of the annual on-site training date.

Failure to complete the annual OSHA training could result in the faculty member being unable to teach at Denver College of Nursing College.

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, deans, Career Services personnel, and Student Services Director

Category 2 employees must follow the same guidelines for a new employee.

Continuing employees in Category 2 are required to review the VTA OSHA course during the same time as the annual update of faculty. This will suffice as an update on OSHA requirements.

Category 3

All other employees on campus must complete the VTA OSHA training as a new employee. No further training is required unless there is a change in position to another category.


Documentation

Certificates of completion must be in the personnel file.

Schools 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.

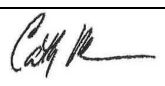
Appendix 7: Training and Testing Tracking

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

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 or Dean Signature (Electronic accepted)
Emergency Notification System Test/Training	Director of Business Operations	6/20/24	Documentation is located within the ignite to learn application	Chad Muse 

Appendix 8: Update Tracking

Any time the EPP is updated, the date of revision should be noted in the table below.

Version	Date	Campus President or Dean Signature (Electronic accepted)
1	Nov 2020	
2	June 2022	
3	July 2023	
4	July 2024	

Appendix 9: Additional Campus Specific Items that need added to the plan

Communication System:

- Mobile Loudspeaker (Audio Hailers). The Emergency Response Team will utilize the audio hailers for an on-site public information and instruction purposes.
- The signal to evacuate any building will be by mobile loudspeaker and the emergency notification system.
- **A steady three (3) minute Siren Tone is the Attention Alert Signal.** Tune your radio or television to any station and listen for emergency information and instructions.

Appendix 10: Department of Local Affairs Division of Emergency Management

9195 E. Mineral Avenue, Suite 200, Centennial, Colorado 80112
(720) 852-6600

24-Hour Emergency Number (303) 279-8855

All Division staff contact information is found: <https://cdola.colorado.gov/contact>

Colorado Disaster Emergency Act of 1992, updated in 2018 to address all phases of emergency management. HB 18-1394

Financial Assistance

<https://cdola.colorado.gov/financial-assistance>

Resilience Planning Program

<https://cdola.colorado.gov/resilience-planning/resilience-planning-program>

FEMA Public Assistance Applicant Handbook

www.fema.gov/pdf/government/grant/pa/fema323_app_handbk.pdf

FEMA Request for Public Assistance Form

www.fema.gov/sites/default/files/2020-06/fema-public-assistance-request-for-public-assistance_form009-0-49_06-2020.pdf

Small Business Administration Disaster Assistance

<https://www.sba.gov/funding-programs/disaster-assistance>

USDA Disaster Assistance Programs

<http://disaster.fsa.usda.gov/fsa.asp>

Robert T. Stafford Disaster Relief and Emergency Assistance Act

<https://www.fema.gov/disaster/stafford-act>

Information on Government Grants

<https://www.grants.gov>

Homeland Security - Disasters

<https://www.dhs.gov/topics/disasters>

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 Academic Dean'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 or the Academic Dean's office—they will handle the situation.
- **What if I see people on campus who look like they do not belong?**
 - Go immediately to the Program Director, Academic Dean, or 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 Academic Dean or Campus President's office.
- **What if I think I am being stalked?**
 - Immediately notify the Academic Dean or Campus President's office.
- **What if someone becomes injured or ill in my class?**
 - Immediately notify the front desk.
- **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 Academic Dean.
 - 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 Academic Dean or Campus President's office.
- **What if I have a student who shows symptoms of depression or anxiety?**
 - Immediately notify the Academic Dean or 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 Academic Dean or Campus President's Office. If the officer refuses to comply with your request, do not resist in any way. Immediately go to the Academic Dean and report the incident.
- **What if a faculty becomes ill during class?**
 - A student in the class should notify the Program Director or Academic Dean immediately.
- **What if a faculty feels threatened by a student?**
 - Leave the room. Go immediately to the Academic Dean or Campus President's Office.

Appendix 12: Education Affiliates Pandemic/Influenza Plan

Pandemic/Influenza Plan Overview

Introduction

Current guidance from the Center for Disease Control and the US Department of Health and Human Services suggests that initial fears about the Covid-19 virus spreading are becoming a reality in the U.S. This most recent virus was declared an official Pandemic as the prevalence constitutes a major Outbreak and serious concern. Should this virus suddenly become excessively virulent, 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.

The U.S. Department of Education released guidance for institutions to address compliance with Title IV Higher Education Act (HEA) policies for students receiving federal financial aid whose activities have been affected by COVID-19. Institutions should review this guidance for all activities that are subject to Title IV policies and regulations. The Department is providing some short-term flexibility for schools to help students complete the term for which the students are currently enrolled.

See <https://ifap.ed.gov/electronic-announcements/030520Guidance4interruptionsrelated2CoronavirusCOVID19>

For more details please visit the Department's Coronavirus webpage at <https://www.ed.gov/coronavirus>

Underlying Assumptions

While this plan is intended to apply to various instances of an Influenza Outbreak additional guidance specific to Higher Education may be found in the CDC document, *Interim Guidance for Administrators of US Institutions of Higher Education: Plan, Prepare and Respond to Coronavirus Disease 2019* which may be accessed at: <https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html>

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 in order 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 the initial pandemic influenza outbreak, as well as to subsequent waves. A pandemic outbreak 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 Influenza 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 Influenza emergency. Media relations include use of the Education Affiliates Colleges’ homepages/Facebook sites, 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 influenza in the United States, the Campus Emergency Response Team will be convened. As evidence of potential pandemic influenza 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 Flu action levels in the following sections of this plan. Draft communications will be developed in advance by Education Affiliates Marketing team as necessary and appropriate to addresses 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:** Land line 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 to provide for the continuity of education for individual students through distance education if necessary. When Education Affiliates suspends the on-campus delivery of an entire academic program for an extended time 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 could 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 syllabus, 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 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 work stations, 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. At this time 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 Human Resources. 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 defining 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 function will be reduced, 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 Flu 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 • 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. • 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/Influenza 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 influenza 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 be establishing 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.

HR asks Department Heads to

- 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 in the event that 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 protections 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 flu virus 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 (weather one?) 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 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 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.
- Faculty include information about Covid-19 in their syllabi.
- Faculty place as much course content as possible, including 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 cases of presentations and exams there are online options that may be more appropriate, and that determination may be made in consultation with the Education Affiliated 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/Influenza Plan with any new developments.
- Test the action plan with a table-top exercise drill or training scenarios for key staff and repeat if deemed necessary.

Ensure all elements of the Pandemic/Influenza 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 Influenza 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 department.

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 our 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.

Human Resources:

- Benefits:
 - Ensures procedures are in place to process appropriate claims, along with general liability, 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 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 for 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 (Template attached as an Appendix).

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 influenza cases on a regular basis- mechanisms for this are established.

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

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 is 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 HR

- Inform required staff of staffing changes / plan on 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 anticipate 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, Facebook is 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 appraise of evolving status of activities on campus and steps being taken by the institution, as where to find additional information, such as 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 take 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 website, 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 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

- Financial Aid Office continue 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 to capture categories of financial impact due to campus closure

Campus Operations

Facility and Equipment

Adjust infection control and risk-containment strategies at 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 services vendor 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 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 we will strive to maintain continuity of operations through distance education methods.

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

Campus Presidents or their designee maintains contact with County and State health departments.

Student Services maintain email contact and web information.

Individual electronic inquiries will be triaged 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 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

- Reconcile aid/loan approvals and actual disbursements

Response Action Level: Recovery

Recovery stage begins once 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 impact of the pandemic to 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 coordinate the resumption of classes and other academic activities.

The Campus coordinates with Communications and Student Services 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 Accounting, 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 Influenza is subject to frequent and significant changes, readers of this document should check with Compliance 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. However, the route of transmission of Covid-19 Influenza in humans is unknown currently.

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: At this point, most suppliers are out of inventory)

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
- 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 be 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

NOTE of CAUTION: Since information related to Pandemic Influenza or Covid-19 Influenza is subject to frequent and significant changes, readers should check with Public Health Officials to ensure they have the most recent version.

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 of floors and other surfaces, special attention should be given to frequently touched surfaces.
4. To avoid possible aerosolization of virus, 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 patient 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 of 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 Generally not recommended	Consider: ≤4 weeks Consider: ≤4 weeks	Recommend: ≤12 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) 	Generally not recommended	Consider	Recommend
<ul style="list-style-type: none"> • Increase distance between persons (e.g., reduce density in public transit, workplace) 	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