

The Board of Trustees for the Finishing Trades Institute of the Upper Midwest (FTIUM) adopts the following policy with regard to prevention of exposure to COVID-19 by students, staff, directors and trustees of the FTIUM effective October 1, 2020. This policy updates and replaces the policy and procedure adopted by the Board of Trustees for the FTIUM effective June 5, 2020.

The FTIUM takes the health and safety of our students, faculty, and staff very seriously. With the spread of the coronavirus or "COVID-19," a respiratory disease caused by the SARS-CoV-2 virus, we all must remain vigilant in mitigating the outbreak. This is particularly true as the FTIUM supports the construction industry, which has been deemed "essential" during this Declared National Emergency.

To be safe and maintain operations, we have developed this COVID-19 Plan to be implemented throughout the FTIUM. The FTIUM has also identified a team of employees to monitor available U.S. Center for Disease Control and Prevention ("CDC"), Minnesota Department of Health (MDH) and the Occupational Safety and Health Administration ("OSHA") guidance on the virus. The Plan describes how to prevent student exposure to coronavirus, protective measures to be taken at the FTIUM, personal protective equipment (PPE), and hands-on training practice controls to be used, cleaning and disinfecting procedures, and what to do if a faculty, staff or student becomes sick.

This Plan is based on currently available information from the CDC, MDH and OSHA. Further, it is drafted to be consistent with the provisions of State of Minnesota Emergency Executive Order 20-52 (Authorizing Students in Critical Sectors to Return to Safe Higher Education Institutions for Completion of a Postsecondary Credential).

This policy was originally adopted on June 5, 2020. However, given the nature of the pandemic, this policy and procedure is subject to revision based upon further guidance to be provided by the CDC, OSHA, MDH and other public officials as well as ever changing circumstances. The FTIUM may also amend this Plan based on its own operational needs. As a result of all of the above, the Board of Trustees resolved to adopt a revised plan effective October 1, 2020 to incorporate update provisions to address COVID-19 concerns.

## **I. Responsibilities of FTIUM Directors, Trainers, Staff and Trustees**

The FTIUM directors, faculty, and staff must be familiar with this Plan and be ready to answer questions from students and visitors. FTIUM directors, faculty, staff and trustees must always set a good example by following this Plan. This involves practicing good personal hygiene and job site safety practices to prevent the spread of the virus within FTIUM. FTIUM directors, faculty, staff and trustees must encourage this same behavior from all students.

## **II. Responsibilities of Students**

We ask every one of our students to help with our prevention efforts while at the FTIUM. To minimize the spread of COVID-19 at our FTIUM, we all must play our part. As set forth below, the FTIUM has instituted various housekeeping, social distancing, and other best practices at our facility. All students must follow these without exception. In addition, students are required to report to the FTIUM Directors or Faculty if they experience signs or symptoms of COVID-19, as

described below. If you have a specific question about this Plan or COVID-19, please ask the FTIUM Directors or Faculty.

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

- Wearing a mask.
- Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand sanitizer with at least 60% ethanol or 70% isopropanol. Students will find alcohol-based hand sanitizer throughout the FTIUM facility.
- Avoid touching your eyes, nose, or mouth with hands.
- Follow appropriate respiratory etiquette;
  - Cover your mouth and nose with a tissue when you cough or sneeze
  - Throw used tissues in the trash
  - If you don't have a tissue, cough or sneeze into your elbow, not your hands
  - Bend your arm, and make sure you sneeze into, not over, your elbow
- Immediately wash your hands after blowing your nose, coughing or sneezing.
- Avoid close contact with people who are sick. Close contact is specifically defined as exposure within 6 feet of an infected person for a cumulative total of 15 minutes or more over a 24-hour period starting from 2 days before illness onset (or, for asymptomatic patients, 2 days prior to test specimen collection) until the time the patient is isolated.
- Maintain at least six (6) feet physical distance while in shared spaces. Students are to engage in social distancing not only while on the FTIUM premises, but also are requested to engage in such social distancing while not on the premises so as to protect themselves and their fellow students.

In addition, students must familiarize themselves with the symptoms of COVID-19:

- Coughing;
- Fever;
- Shortness of breath, difficulty breathing; and
- Early symptoms such as chills, repeated shaking with chills, muscle pain, sore throat, the new loss of taste or smell, and headache.

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

away. Close contact is specifically defined as exposure within 6 feet of an infected person for a cumulative total of 15 minutes or more over a 24-hour period starting from 2 days before illness onset (or, for asymptomatic patients, 2 days prior to test specimen collection) until the time the patient is isolated.

### **III. FTIUM Protective Measures**

The FTIUM has instituted the following protective measures.

#### *A. General Safety Policies and Rules applicable to Students, Staff and Instructors*

- Before beginning training, students will be briefed on the new exposure controls and class expectations for conducting training.
- Students are required to wear a mask. A mask will be provided on the first day of class by FTIUM. Students may also wear an appropriate mask of their own choice.
- Students, staff and visitors will be screened via a temperature check and pre-admittance screening questionnaire.
- The FTIUM will provide soap, running water, and single-use towels or air dryers for frequent handwashing and will ensure they are replenished throughout the training day. When soap and water are not available, alcohol-based hand sanitizers with greater than 60% ethanol or 70% isopropanol will be provided.
- “Wash Your Hands,” “Cover Your Face” and “Practice Social Distancing (6-feet)” signs will be posted through the FTIUM premises.
- Any student/visitor showing symptoms of COVID-19 will be asked to leave the FTIUM and return home. Such student may return to campus only when they have met the recovery provisions as outlined in the Section V. FTIUM Exposure Situations and Protocols below.
- During all in-person training classes, no more than ten (10) people (1 instructor and 9 students) will be permitted in a classroom. Students must remain at least six (6) feet apart at all times. In-person training sessions will be limited by the available classroom size to maintain social distancing. Classroom seating will be arranged to ensure students maintain at least six (6) feet between each student.
- The faculty's desk, chair, workstation, etc. will be located a minimum of six feet from the students.
- Students must avoid physical contact with others (No handshaking, high-fives, or fist bumps) and direct others to increase personal space to at least six (6) feet, where possible.
- Attendance will be collected verbally, and the trainer will sign-in each student. Attendance will not be tracked through passed-around sign-in sheets or mobile devices.

- If tests, exams, assessments, etc. are administered, answer sheets will be placed on desk before students arrive. Students will grade themselves. Instructors/Trainers will take completed post-test with gloved hands and place in a manila envelope. Paperwork will be quarantined for a minimum of 72 hours before being opened and filed.
- If self-grading of tests, exams or assessments, is not feasible, faculty will establish a collection area where students will place their completed test, exam, assessment, etc. for grading. Students will maintain at least six (6) feet between themselves and other students as they approach/leave the collection area. Trainers will take the materials with gloved hands and grade each test, exam or assessment and record the score. Students can verbally be told if they passed or failed, or trainer can post grades, ensuring student anonymity, in the classroom. Trainers will take completed post-test with gloved hand and place in a manila envelope. Paperwork should be quarantined for a minimum of 72 hours before being opened and filed.
- Student breaks and lunches will be staggered, to reduce the size of any group at any one time to less than ten (10) people in the lunchroom. Students will be released by seating rows to maintain social distancing. A distance of six (6) feet will be maintained during lunch and breaks and students will be asked to assist in cleaning and sanitizing the table they used for lunch. Students are to wash their hands both before and after any lunch or break.
- In lieu of using a common source of drinking water, such as a water fountain, cooler, or bubbler, students are to bring their own individual water bottles and are not to share with anyone.
- Students are encouraged to bring food from home and are not to share their food with others.
- If lunch is to be provided by the FTIUM, lunches will be prepared off-site and will be in the form of individually packaged "box lunches." No buffet-style meals will be provided. Drinks will be in bottles or cans and sealed. If coffee is provided, a designated staff member at the FTIUM will prepare cups of coffee using food handling techniques and good hygiene, eliminating the risk of multiple students using a single coffee pot.
- Students must clean their hands by washing them with soap and water for at least 20 seconds. When handwashing isn't available, use an alcohol-based hand sanitizer with greater than 60% ethanol or 70% isopropanol. Soap and water should be used if hands are visibly dirty.
- Students will clean their hands frequently, including before and after going to the bathroom, before and after eating, and after coughing, sneezing, or blowing their nose.
- The use of books, manuals, student guides, handouts, pens, pencils, highlighters, and markers will be eliminated where practical. If needed, they will be one-time use only. If books, manuals, student guides or other paper-based training materials need to be saved, trainers will take the materials with gloved hands and quarantine them for a minimum of 72 hours before being reused.

- Students are not to use other students' personal protective equipment (PPE) and training materials (i.e., manuals, pens, highlighters, notepads, etc.) and limit the use of other students' tools and equipment. To the extent PPE, tools and equipment must be shared; the FTIUM will provide alcohol-based wipes, or other disinfecting materials, to clean PPE, tools, and equipment before and after use. When cleaning PPE, tools, and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.
- Students are encouraged to minimize ridesharing.
- One instructor will operate audio/visual equipment and will be responsible for cleaning the equipment at the end of class using a disinfecting wipe and gloved hand.
- The trainers will now handle all classroom-based props/demonstration materials. The trainer utilizing the prop/demonstration materials will be responsible for sanitizing the prop/demonstration materials before and after each use.

*B. FTIUM Students-Before Entering FTIUM Premises*

- Students are to arrive at least fifteen (15) minutes before their class is set to start.
- Students will be subject to screening prior to admittance to the FTIUM. The screening will take place at the south entrance to the the FTIUM facility.
- Students, via their phone, are required to complete a questionnaire regarding possible COVID-19 exposure and symptoms. The questionnaire will ask the following questions:
  - Have you been diagnosed with COVID-19 or been exposed to someone who has been diagnosed with COVID-19 in the last 14 days?
  - In the last 14 days have you experienced, or have you been exposed to someone who is experiencing, any of the following symptoms of COVID-19: cough, shortness of breath, fever (temperature above 100.4 degrees), chills, muscle pain, headache, sore throat, or new loss of taste or smell.
  - Are you currently seeking a diagnosis regarding whether you have COVID-19 or have you been exposed to someone who is seeking a diagnosis?
  - In the last 14 days have you traveled to or been exposed to someone who has traveled to a “hot spot” location that is considered high risk for COVID-19 exposure by the Centers for Disease Control?
- Following completion of the questionnaire, students will have their temperature taken. The temperature must be under 100.4 to enter the FTIUM. If the temperature is 100.4 or higher, the student will be sent home and will be subject to the protocols in the section entitled “FTIUM Exposure Situations” before they are allowed to return to the FTIUM.

- Students must be wearing a mask to enter the FTIUM.

### C. *FTIUM Visitors*

- The number of visitors to the FTIUM will be limited to only those necessary for the work.
- All visitors will be screened in advance of arriving at the FTIUM. If the visitor answers "yes" to any of the following questions, he/she will not be permitted to access the FTIUM:
  - Have you been diagnosed with COVID-19 or been exposed to someone who has been diagnosed with COVID-19 in the last 14 days?
  - In the last 14 days have you experienced, or have you been exposed to someone who is experiencing, any of the following symptoms of COVID-19: cough, shortness of breath, fever (temperature above 100.4 degrees), chills, muscle pain, headache, sore throat, or new loss of taste or smell.
  - Are you currently seeking a diagnosis regarding whether you have COVID-19 or have you been exposed to someone who is seeking a diagnosis?
  - In the last 14 days have you traveled to or been exposed to someone who has traveled to a “hot spot” location that is considered high risk for COVID-19 exposure by the Centers for Disease Control?
- All visitors to the FTIUM will have their temperature checked prior to admittance to the FTIUM.
- All visitors to FTIUM will be required to wear a mask.
- FTIUM deliveries will be permitted but should be appropriately coordinated in line with the FTIUM's minimal contact and cleaning protocols. Delivery personnel should remain in their vehicles when practical.

### D. *Personal Protective Equipment and Work Practice Controls*

- All shared FTIUM Personal Protective Equipment (PPE) will be cleaned and disinfected after each student's use. Shared PPE may include, but is not limited to:
  - Respirators;
    - **NOTE:** The CDC is currently not recommending that healthy people wear N95 respirators to prevent the spread of COVID-19. Students should wear reusable, elastomeric N95 respirators if required by the work.
  - Hearing Protection: Earmuffs
  - Gloves
  - Hard hats
  - Safety Glasses
  - Chemical Protective Clothing
  - Welding Masks and Flame-Resistant Clothing

#### **IV. Job Site Cleaning and Disinfecting**

The FTIUM, in conjunction with District Council 82 which is the building landlord, operates a portion of the facility and jointly accesses certain common areas, has instituted regular housekeeping practices, which includes cleaning and disinfecting frequently used Personal Protective Equipment (PPE), tools and equipment, and other elements of the FTIUM environment, where possible.

- Office areas, classrooms, common areas, high contact surfaces, bathrooms, and break/lunchroom areas will be cleaned at least once per day. Employees performing cleaning will be issued proper PPE, as recommended by the CDC.
- Trash collected from the FTIUM must be changed frequently by someone wearing nitrile, latex, or vinyl gloves.
- Any portable toilets used on-site should be cleaned by the leasing company at least twice per week and disinfected on the inside. The FTIUM will ensure that hand sanitizer dispensers are always filled. Frequently touched items (i.e., door pulls and toilet seats) will be disinfected often.
- Vehicles and equipment/tools should be disinfected at least once per day and before a change in operator or rider.
- If an FTIUM employee or student has tested positive for COVID-19, OSHA has indicated that there is typically no need to perform special cleaning or decontamination of work environments, unless those environments are visibly contaminated with blood or other bodily fluids. Notwithstanding this, the FTIUM will disinfect those areas of the FTIUM that a confirmed-positive individual may have come into contact with before FTIUM staff and students can access that space again.
- The FTIUM will ensure that any disinfection of tools or surfaces shall be conducted using one of the following:
  - Common EPA-registered household disinfectant;
  - Alcohol solution with at least 60% ethanol or 70% isopropanol; or
  - Diluted household bleach solutions (these can be used if appropriate for the surface).
- The FTIUM will train employees on the hazards of the cleaning chemicals used in the FTIUM in accordance with OSHA's Hazard Communication standard (29 CFR §1910.1200).
- The FTIUM will maintain Safety Data Sheets of all disinfectants used on site.

## **V. Site Response Procedures – COVID-19 Exposure**

- If an individual becomes ill with COVID-19 symptoms while at the FTIUM or if an individual that is reasonably suspected or confirmed to have COVID-19 came into close contact with students and staff of the FTIUM, the FTIUM will stop all instruction directly associated with the area where the individual may have been working or may have visited while on site (restroom, designated break area, storage room, shanty, etc.). The FTIUM will additionally:
  - Control all work or common areas in such a manner to eliminate the potential for both student, staff and public exposure.
  - Post signage, barricades and other protective measures to ensure the area remains undisturbed.
  - Wait 24 hours before cleaning and disinfecting to minimize potential for others to be exposed to respiratory droplets.
  - Work with environmental health & safety resources to determine scope of cleaning needed. Cleaning must comply with OSHA’s standards, including proper disposal of regulated waste.
  - In many cases, the area may re-open once the cleaning procedures have been completed.
- If more than one individual on site has symptoms or has been diagnosed with COVID-19, it may be necessary or appropriate in some cases to take more stringent measures to prevent or remediate a COVID-19 outbreak at the FTI-UM. This may include the following measures:
  - Shutting down all or part of the FTIUM facility for at least seventy-two (72) hours.
  - Deep cleaning the affected area or the entire facility.
  - Testing all students and staff as a precondition of returning to work at the jobsite.
  - Investigating to identify those individuals who have been in close contact with those who have tested positive or shown symptoms.
  - Seeking assistance from the MDH.
- Any recommendations made by OSHA, CDC or MDH will also be incorporated into the FTIUM Plan and Procedure and implemented prior to the re-opening of any site or area of the FTIUM.

## **VI. FTIUM Exposure Situations and Protocols**

The FTIUM, consistent with guidelines issued by the MDH, will react to COVID-19 exposures consistent with the provisions below:

### **Student Exhibiting COVID-19 Symptoms**

If a student exhibits COVID-19 symptoms:

- If the student exhibits symptoms in the daily student pre-screening will be immediately separated from other students, staff and instructors and sent home.
- If the student first exhibits symptoms once inside the FTIUM, the student will be immediately separated from other students, staff and instructors and sent home. The FTIUM will provide any necessary assistance to allow the student to return home.
- The student must remain away from the FTIUM until he or she is symptom-free for fourteen (14) days without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants).
- The FTIUM will similarly require a student, that reports to the FTIUM with symptoms to return home until they are symptom-free for fourteen (14) days.

### **FTIUM Employee Exhibiting COVID-19 Symptoms**

If an FTIUM employee exhibits COVID-19 symptoms:

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

### **FTIUM Employee Tests Positive for COVID-19**

An FTIUM employee that tests positive for COVID-19 will be directed to:

- Self-quarantine away from work.
- Employees that test positive and are symptom-free may return to work when at least fourteen (14) days have passed since the date of his or her first positive test and have not had a subsequent illness.
- Employees that test positive and are directed to care for themselves at home may return to work when: (1) at least 72 hours (3 full days) have passed since recovery;<sup>1</sup> and (2) at least fourteen (14) days have passed since symptoms first appeared.
- Employees that test positive and have been hospitalized may return to work when directed to do so by their medical care provider.

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<sup>1</sup> Recovery is defined as: (1) resolution of fever with the use of fever-reducing medications; and (2) improvement in respiratory symptoms (e.g., cough, shortness of breath).

- The FTIUM will require an employee to provide documentation clearing their return to work.

### **FTIUM Student Has Close Contact with a Tested Positive COVID-19 Individual**

Students that have come into close contact with a confirmed-positive COVID-19 individual will be directed to:

- Remain away from the FTIUM for 14 days from the last date of close contact with the carrier.
- Close contact is specifically defined as exposure within 6 feet of an infected person for a cumulative total of 15 minutes or more over a 24-hour period starting from 2 days before illness onset (or, for asymptomatic patients, 2 days prior to test specimen collection) until the time the patient is isolated.

### **FTIUM Employee Has Close Contact with a Tested Positive COVID-19 Individual**

Employees that have come into close contact with a confirmed-positive COVID-19 individual (co-worker or otherwise) will be directed to:

- Self-quarantine for 14 days from the last date of close contact with the carrier.
- Close contact is specifically defined as exposure within 6 feet of an infected person for a cumulative total of 15 minutes or more over a 24-hour period starting from 2 days before illness onset (or, for asymptomatic patients, 2 days prior to test specimen collection) until the time the patient is isolated.

If the FTIUM learns that an employee has tested positive, the FTIUM will investigate co-workers that may have had close contact with the confirmed-positive employee in the previous 14 days and direct those individuals that have had close contact with the confirmed-positive employee to self-quarantine for 14 days from the last date of close contact with the carrier.

If an employee learns that he or she has come into close contact with a confirmed-positive individual outside of the workplace, he/she must alert the FTIUM Director of the close contact and also self-quarantine for 14 days from the last date of close contact with the carrier.

As note elsewhere in this policy, close contact is specifically defined as exposure within 6 feet of an infected person for a cumulative total of 15 minutes or more over a 24-hour period starting from 2 days before illness onset (or, for asymptomatic patients, 2 days prior to test specimen collection) until the time the patient is isolated.

If it is necessary to disclose a students name who is positive for COVID-19, the FTIUM will follow the protocols as provided by the Family Educational Rights and Privacy Act (FERPA) issued March 2020. If it is a staff member, the FTIUM will maintain the confidentiality of the staff members identity unless the individual agrees to allow the disclosure of their identity.

## Confirmed COVID-19 Infection Inside FTIUM

- If it has been **less than 7 days** since the sick employee used the facility, clean and disinfect all areas used by the sick employee following the [CDC cleaning and disinfection recommendations](#).
- If it has been **7 days or more** since the sick employee used the facility, additional cleaning and disinfection is not necessary. Continue routinely cleaning and disinfecting all high-touch surfaces in the facility.
- Other employees may have been exposed to the virus if they were in “close contact” (within approximately 6 feet or 2 meters) of the sick employee for a prolonged period of time.
  - Those who have symptoms should self-isolate and follow [CDC recommended steps](#).
  - In most workplaces, those potentially exposed but with no symptoms should remain at home or in a comparable setting and practice social distancing for 14 days.
- Employees not considered exposed should self-monitor for symptoms such as fever, cough, or shortness of breath. If they develop symptoms, they should notify their supervisor and stay home.

## Return to FTIUM After COVID-19 Illness or Self-Quarantine

- If a student or employee under the provisions of this Section VI. has been required to self-quarantine due to their own COVID-19 illness or due to their exposure to someone with COVID-19, regardless of whether the individual has experienced any COVID-19 symptoms, the individual is not permitted to return to the FTIUM, as either a student or employee, until they have received a negative COVID-19 and have provided the FTIUM with documentation evidencing the negative test result.
- Paid Sick Leave. An employee is eligible for paid sick leave if they experience one of the following FFCRA paid sick leave events:
  - Employee is quarantined for COVID-19 per legal order;
  - Employee is advised to self-quarantine by a health care provider;
  - Employee is experiencing symptoms of COVID-19 and needs to seek medical attention;
  - Employee is caring for someone who is quarantined or is advised to self-quarantine by a health care provider;
  - Employee is caring for a child whose school is closed due to COVID-19 or whose childcare provider is not available due to COVID-19 precautions;
  - Employee is experiencing symptoms of another condition as determined by HHS.
- Amount of employee paid sick leave:
  - Employee COVID-19 Condition: Up to 80 hours/10 days of paid leave at the regular rate of pay, but capped at \$511/ day up to a maximum of \$5,110/aggregate if the leave is due to the employee’s own medical condition.
  - Employee Spouse or Dependent COVID-19 Condition: Up to 80 hours/10 days of paid leave at 2/3 of the regular rate of pay to care for a spouse or dependent child,

capped at \$200/day up to a maximum of \$2,000/aggregate.

## **Policy and Procedure for FTIUM Instructors at Offsite Locations**

- FTIUM Instructors will teach at offsite locations only when absolutely necessary during the duration of the COVID-19 crisis.
- An offsite location must have developed and implemented a COVID-19 Plan for the FTIUM to conduct training at that location. Further, the offsite location's COVID-19 policy and procedure must meet or exceed the standards established in the FTIUM's COVID-19 Plan before an FTIUM instructor is permitted to conduct training at the offsite location.
- Before an FTIUM Instructor travels to an offsite location to conduct training, the COVID-19 Plan and Procedure for that off-site location must be submitted to the Director of FTIUM for review.
- The Director of FTIUM will consult with relevant personnel and outside counsel as necessary, in evaluating the offsite locations COVID-19 Plan to determine if it meets or exceeds the requirements of the FTIUM COVID-19 Plan.
- If the offsite location's plan is deemed deficient in certain areas when evaluated against the FTIUM COVID-19 Plan, FTIUM personnel will work with the officials at the offsite location to upgrade that locations plan to meet the FTIUM plan or, alternatively, the FTIUM's procedures will be substituted for those of the offsite location and the offsite location must agree in writing to those modifications as required by the FTIUM. FTIUM will work with the key personnel at the offsite location in advance of the provision of training classes so as to assure the necessary steps have been taken so that the offsite location is in compliance with FTIUM's COVID-19 Plan.

## **VI. OSHA Recordkeeping**

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

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

If an employee has a confirmed case of COVID-19, the FTIUM will conduct an assessment of any workplace exposures to determine if the case is work-related. Work-relatedness is presumed for illnesses that result from events or exposures in the work environment unless it meets certain exceptions. One of those exceptions is that the illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs *outside* of the work environment. Thus, if an employee develops COVID-19 *solely* from exposure outside of the work environment, it would *not* be work-related, and therefore not recordable.

The FTIUM's assessment will consider the work environment itself, the type of work performed, the risk of person-to-person transmission given the work environment, and other factors such as community spread. Further, if an employee has a confirmed case of COVID-19 that is considered work-related, the FTIUM will report the case to OSHA if it results in a fatality within 30 days or an in-patient hospitalization within 24-hours of the exposure incident occurring.

## **VII. Confidentiality/Privacy**

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

## **VIII. General Questions**

Given the fast-developing nature of the COVID-19 outbreak, the FTIUM may modify this Plan on a case by case basis. If you have any questions concerning this Plan, please contact the Directors.

As authorized by the Board of Trustees of the Finishing Trades Institute of the Upper Midwest, this policy and procedure is adopted effective October 1, 2020.

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Gary Buchert, Co-Chair

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Terry Nelson, Co-Chair