

COVID-19 EXPOSURE CONTROL & RESPONSE PLAN FOR CUSTOMERS

Committed and prepared to resuming transportation services and keeping our drivers, students and communities safe.

ALL-STAR TRANSPORTATION COVID-19 EXPOSURE CONTROL & RESPONSE PLAN

1. This document is meant to serve as guidelines and recommendations for employees of All-Star Transportation (“All-Star”, or the “Company”) only. In determining the applicability of any of the guidelines or recommendations to any given situation, appropriate All-Star staff will work with customers and school districts to adjust as necessary.
2. This is not to in any way to be construed as anything other than guidelines and recommendations and does not constitute the basis for a commitment or promise to do anything herein. Customers who request that All-Star adopt any procedures or purchase any equipment equivalent or approximately conforming with the guidelines or recommendations set forth herein that will add to All-Star’s cost of doing business and must agree to an amendment to their transportation contract that will provide for adequate compensation to All-Star for those added costs and limit liability of All-Star for those procedures and equipment.
3. The guidelines and recommendations are based in part on the Centers for Disease Control and Prevention (CDC) guidance and on best practices. Guidance from federal, state, and local authorities is subject to frequent change and may require revisions to the guidelines and recommendations contained herein. Accordingly, the Company may see fit to revise this policy based on the latest guidance. As a general matter, as with any Company policy, the Company may revise or discontinue this policy at any time, for any reason, with or without advance notice.
4. The guidelines and recommendations contained herein are not promissory and do not set terms or conditions of employment or create an employment contract.

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PURPOSE

All-Star Transportation (“All-Star”, or the “Company”) is dedicated to the protection of its employees, customers, facilities, and resources. Additionally, we are committed to ensuring that our company can continue all aspects of its critical business processes during an infectious disease outbreak and can safely resume normal operations as quickly as possible after an outbreak affects our facility. We place a high priority on developing, validating, and, if necessary, implementing our company's COVID-19 Exposure Control & Response Plan.

This plan was rigorously developed by consulting epidemiological experts and public health agencies including the Centers for Disease Control and Prevention (“CDC”). All information was gathered and vetted to be fact-based and medically sound as of the date of publication; however, pandemic information evolves over time. Therefore, this plan and its guidelines are subject to amendment as more information becomes known.

If after reading this plan you find that improvements can be made, please funnel your ideas through your local All-Star contact or All-Star Terminal Manager.

ADMINISTRATIVE DUTIES

The COVID-19 Task Force, our COVID-19 Exposure Control & Response Plan Team (or “the Team”), is responsible for establishing, implementing, and overseeing our written COVID-19 Exposure Control & Response Plan. The Team has full authority to make necessary decisions to ensure the success and effectiveness of this plan.

WHAT IS COVID-19?

Coronavirus disease (COVID-19) is an infectious disease that spreads from person to person, primarily through droplets of saliva or discharge from the nose when an infected person coughs or sneezes.

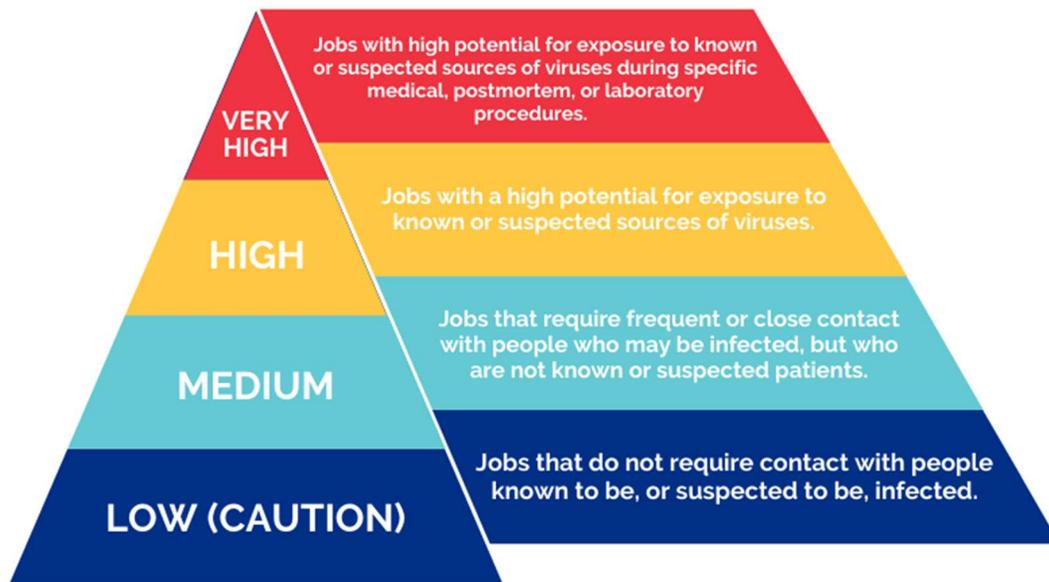
You can become infected by coming into close contact¹, approximately six feet, with a person infected with COVID-19. Exposure is also possible by touching a surface or object that has the virus on it, and then touching your mouth, nose, or eyes with your hands. COVID-19 symptoms can range from mild to moderate (or no symptoms) to severe illness.

¹ Note: The United States Centers for Disease Control and Prevention (CDC) defines “close contact” as anyone who was within 6 feet of an infected person for at least 15 minutes starting from 48 hours before the person began feeling sick until the time the patient was isolated.

EXPOSURE DETERMINATION

Job tasks can be divided into four exposure risk levels:

OCCUPATIONAL RISK LEVELS



We have identified the following levels of exposure risk based on job title and work being performed. For this matrix, full-time, part-time, temporary, contract, and per diem employees have all been considered.

Exposure Risk Level	Job Title	Department / Location
Medium	Drivers / Monitors	Operations
Medium	Office Staff	Operations
Medium	Maintenance	Maintenance
Low	Regional / Corporate	Corporate

SOCIAL DISTANCING

One way to potentially prevent the spread of COVID-19 in the workplace is for employees to practice certain social distancing guidelines. "Social distancing" means maintaining space between yourself and other people outside of your home.

Employees are expected to exercise the following social distancing measures while in the workplace:

- Maintain CDC-recommended guidelines for social distance from others whenever possible
- Prohibit gatherings of groups of employees
- Conduct training classes remotely or in accordance with appropriate distancing guidelines
- Physically arrange workspaces and common areas to prevent crowding
- Establish procedures for handling of deliveries and any shared paperwork
- Close or limit the use of breakrooms, where and when practical
- Avoid all non-essential travel
- Establish remote working procedures
- Limit general public access to the workplace
- Schedule applicant interviews and control workplace access

If it is deemed necessary to have an in-person meeting in the workplace, attendance must be limited to only those employees whose presence is necessary and is not to exceed any maximum gathering limits as defined by CDC and/or local guidelines. The Company will limit and/or space desks and seating appropriately.

In the event that a governing state or local jurisdiction requires social distancing measures that are more stringent than this document, the state or local jurisdiction's rules will prevail in that jurisdiction.

CLEANING & SANITIZATION

In the workplace where there are common areas and frequently touched surfaces, routine cleaning can help to decrease how much of the virus, if any, is on surfaces and objects, thereby reducing the risk of exposure. Generally, if surfaces appear dirty, clean them using detergent or soap and water, prior to disinfection. The CDC recommends most common EPA-registered household disinfectants, including ready-to-use sprays, concentrates, and wipes.

Self-cleaning of employee workspace is encouraged multiple times during each shift. This includes doorknobs, school bus keys, tables and desks, light switches, phones, keyboards and monitors, desks or workspace dividers, breakroom, kitchen and restroom surfaces, and

lobbies or check-in areas. Best practices for cleaning and disinfection processes are outlined below.

VEHICLES

All vehicles will be cleaned and maintained in accordance with applicable federal, state/provincial, local, and/or customer guidelines. **Customer requests regarding additional vehicle cleaning should be discussed with the appropriate All-Star General Manager.**

- Employees will clean the driver compartment and high-touch points using approved cleaning materials in accordance with CDC and Environmental Protection Agency (EPA) guidelines.
- Every bus will be cleaned regularly with approved cleaning materials according to CDC guidelines.
- In the event of a bus swap, employees must clean the driver's compartment and all high-touch surfaces.

TERMINALS & OFFICE BUILDINGS

Thorough cleaning will be performed on high-traffic areas such as breakrooms, water fountains, ice machines, restroom and kitchen areas, and areas of ingress and egress including stairways/stairwells, escalators, handrails, and elevator controls.

- Frequently clean commonly used surfaces including doorknobs, light switches, and handwashing facilities.
- Self-cleaning of employee workspace is encouraged multiple times during each shift. This includes but is not limited to tables and desks, phones, keyboards and monitors, and workspace dividers.
- Avoid sharing phones, work supplies, or office equipment wherever possible.
- Never share personal protective equipment (PPE).
- Where office items must be shared, disinfect between shifts or uses, whichever is more frequent, using a cleaner appropriate for the surface. This includes but is not limited to shared office equipment such as copiers, fax machines, printers, telephones, keyboards, staplers, surfaces in reception areas, and any shared workstations.
- Ensure that sanitary facilities stay operational and stocked at all times and provide additional soap, paper towels, and hand sanitizer when needed.
- When choosing cleaning chemicals, use products approved by the EPA or Regional Health Unit lists for use against COVID-19 and follow all product instructions. Use disinfectants appropriate for the surface and labeled to be effective against emerging viral pathogens, or alcohol solutions with at least 70% alcohol.
- Workers using cleaners or disinfectants must wear PPE as required by the product instructions.

- Office space should be rearranged if necessary, to allow for social distancing. Employees should not face each other without a physical barrier between them.
- Wherever possible, a clear barrier should be placed between dispatch and the driver's area to help provide protection while conducting face-to-face communication.

MAINTENANCE SHOP

Please refer to **Appendix C -- Maintenance Standard Operating Procedures.**

HYGIENE IN THE WORKPLACE

The best position to take in response to COVID-19 is a proactive one. The virus is believed to spread mainly from person-to-person, including through respiratory droplets produced when an infected person coughs, sneezes or when they speak.

However, studies have suggested that COVID-19 may also be spread by individuals who are not showing symptoms, so adherence to a clear set of safety standards may be one of the best defenses towards protecting the safety of yourself, and your co-workers.

Several steps can be taken to help diminish the spread of infection and germs. These include:

- If you have the need to cough or sneeze, do so into the inside of your elbow rather than into your hands.
- Place used tissues immediately into the trash.
- If soap and water are not readily available, use a hand sanitizer that contains at least 70% alcohol, making sure to cover all surfaces of your hands, and rubbing them together until they feel dry.
- Wear a face mask to contain respiratory droplets.
- Additionally, avoid touching your eyes, nose, and mouth with unwashed hands.

One of the best preventive measures one can take to protect themselves against illness is to wash hands often and thoroughly. This is especially important after touching shared surfaces or being in a public space; blowing your nose, coughing, or sneezing; after using the restroom; before and after eating or preparing food; before and after providing care to another or being in contact with an ill person; and any time hands are visibly soiled.

The CDC recommends 5 steps to washing your hands the right way:

- 1) Wet your hands with clean, running water (warm or cold), turn off the tap, and apply soap.
- 2) Lather your hands by rubbing them together with the soap. Lather the backs of your hands, between your fingers, and under your nails.

- 3) Scrub your hands for at least 20 seconds. If you need a timer, you can hum the "Happy Birthday" song from beginning to end twice.
- 4) Rinse your hands well under clean, running water.
- 5) Dry your hands using a clean towel or air dry them.

COVID-19 PREVENTIVE MEASURES

One of the best preventive measures you can take to protect yourself against illness is to wash your hands often and thoroughly. This is especially important after touching shared surfaces, being in a public space, or blowing your nose, coughing, or sneezing.

HAND WASHING: 5 STEPS

- 

Wet your hands with clean, running water (warm or cold), turn off the tap, and apply soap.
- 

Lather your hands by rubbing them together with the soap. Lather the backs of your hands, between your fingers, and under your nails.
- 

Scrub your hands for at least 20 seconds. If you need a timer, you can hum the "Happy Birthday" song from beginning to end twice.
- 

Rinse your hands well under clean, running water.
- 

Dry your hands using a clean towel or air dry them.

WHEN TO WASH HANDS

- After touching shared surfaces or being in a public space or restroom
- After blowing your nose, coughing or sneezing
- Before and after providing care to another or being in contact with an ill person
- Before and after eating or preparing food
- Any time hands are visibly soiled

HAND SANITIZER

If soap and water are not readily available, use a hand sanitizer that contains at least 70% alcohol, making sure to cover all surfaces of your hands, and rubbing them together until they feel dry.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

PPE required to meet local guidelines will be given to employees at no cost to the employee. Should an employee prefer to supply their own PPE, approval must be obtained from an immediate supervisor prior to using. Instruction and training on the proper use, cleaning, and disposal of PPE will be provided. PPE that fails an inspection or is otherwise found to be

defective will be removed from service and discarded, replaced, repaired, or adjusted in accordance with these procedures. In the absence of stricter local guidelines, the Company-approved PPE guidelines are outlined below.

MASKS

- Drivers/Monitors: During all times on duty where practical, operating a vehicle, and interacting with coworkers or the general public
- Maintenance & Administrative Staff: In all shared workspaces, when interacting with other workers, or when social distancing cannot be maintained

GLOVES

- Drivers/Monitors & Administrative Staff: Available upon request
- Maintenance: In all shared workspaces and when interacting with shared surfaces/tools

FACE SHIELDS

- When required by contract/customer or when student management necessitates it

Employees who cannot meet the Company guidelines and recommendations regarding PPE may be protected by the Americans with Disabilities Act (“ADA”) or other federal, state, or local laws. Those employees must contact Human Resources to determine if a reasonable accommodation can be made.

PROCUREMENT & SUPPLIES

To ensure all All-Star terminals and vehicles are prepared with appropriate PPE and cleaning supplies when employees return to work, **an initial shipment containing the following materials will be purchased by the Company and shipped to each location in July:**

- Masks (disposable and reusable/cloth)
- Gloves (disposable nitrile)
- Hand sanitizer
- Vehicle cleaning supplies (disinfecting spray and pump sprayers)

The following materials have also been procured by corporate to ensure adequate supply is available should local needs require it. To obtain additional COVID-19 related supplies, Terminal Managers should contact All-Star's Procurement Department.

- Gloves (disposable nitrile gloves and reusable nitrile/cloth)
- Hand soap/dispensers
- Face Shields
- Facility cleaning supplies

- Thermometers (if/when employee temperature checks are required by local guidelines)
- Additional supplies as needed/requested

TERMINAL & OPERATIONAL GUIDELINES

CUSTOMER REQUESTS & REQUIREMENTS

We recognize that each school, district, and community face unique challenges related to the management and navigation of school reentry amid COVID-19. To ensure that the plans for the reopening of schools and communities address those challenges, collaboration across all stakeholders involved in the safe transportation of students to and from school will be critical.

All-Star's leadership teams are actively participating in school re-opening committees and planning meetings. We are committed to partnering with our customers to ensure our strategies and plans are aligned. As schools evaluate certain measures that may include staggered bell times, rotating schedules, and other opportunities to expand remote learning to maintain physical distancing, we are prepared and committed to partnering with customers to ensure transportation needs are met in this time of transition.

Any unique customer requests and requirements should be discussed with the appropriate All-Star General Manager.

EMPLOYEE CLOCK-IN/OUT

CLOCK-IN/OUT PROCEDURE (U.S. Only)

All-Star has taken a number of steps to ensure that employees are returning to work in as safe of a work environment as possible. Consistent with that goal, the Company is taking steps in as many areas as possible to make the return to work as comfortable as possible including adjusting policies to allow for social distancing wherever practicable.

To that end, and to accommodate employees that are concerned about having to utilize time clocks within the terminals, All-Star has implemented a policy to allow employees to bypass punching in and out at the time clock and will get paid based on the hours for their assigned route that are worked each pay period.

KEYS & PAPERWORK

Under normal circumstances the handling of keys and paperwork would be a transaction occurring multiple times a day between a number of employees. The following guidelines and best practices should be considered to reduce the likelihood of person-to-person transmission of COVID-19:

GENERAL PRECAUTIONS

- Personal protective equipment (masks and gloves) must always be worn when handling keys and paperwork.

DRIVER KEYS & PAPERWORK DISTRIBUTION

- Issue items to drivers as they drive onto the lot to check-in; or
- Meet the driver at their vehicle and place items in a mutually social distanced location.

DRIVER KEYS & PAPERWORK COLLECTION

- Keys and paperwork should be collected and stored in a consistent location, such as a designated drop box.
- Keys should be disinfected after collection.

If limitations in staff resources or physical space prohibit a local terminal or office from implementing the guidelines described above, please work with your supervisor to develop a plan that supports safe distribution of keys and paperwork.

PRE-TRIP/POST-TRIP

While the pre/post-trip process is an independent task, considerations must be made to reduce the likelihood of transmission of COVID-19.

- Avoid touching each component when possible. Any components that must be touched (including high-traffic surfaces) must be disinfected as part of the pre-trip process.
- Maintain social distancing from other drivers/monitors that may be pre/post-tripping other nearby vehicles.

STUDENT LOADING & UNLOADING

- When possible, students should load vehicles from back to front with members of the same families sitting together, provided that the driver can identify and confirm family members. Students should unload from front to back.
- All students should have assigned seating.
- Seat spacing should be considered when possible, allowing for social distancing.
- Operations staff should work with the school district administration to develop efficient loading and unloading procedures at the schools. Time spent parked with students on the bus waiting to unload should be kept to a minimum.

STUDENT MANAGEMENT

We anticipate that we will have situations where our students are frightened by the PPE that our drivers, monitors, and school staff may be wearing. It is important that we keep this in mind when developing our return to school plans, particularly for our special needs students.

- Drivers and monitors must wear appropriate PPE per the **Personal Protective Equipment** guidelines in this plan.
- Operations staff should work with customers to identify students at “High Risk” and develop a transportation plan accordingly. This plan should consider the number of students transported on the vehicle, level of PPE to be used by the students and staff, etc.
- Operations staff should review student transportation plans with the driver and monitor and ensure proper PPE is provided.
- In some cases, it may be necessary to work with the customer to plan a visit with the student and parents/guardians prior to start-up to allow the student to become familiar with the driver/monitor while wearing PPE.

CHILD CHECK PROCESS

- PPE must be worn at all times during this process.
- Employees conducting the child check process should move throughout the bus with the expectation that they will encounter a child, attempting to look into each seat while maintaining as much of a distance as possible, in the event that a child is located.
- To the extent possible, the employee should attempt to wake the child by speaking at a normal voice-level and calling the student's name to wake her or him, without touching the student and without raising their voice. Employees should make every effort possible to wake the child verbally before considering the need to physically interact with the child.
- In the event that the child will not wake up, employees should attempt to wake the child (using proper PPE), by lightly tapping the student on the middle of her or his arm, or on the shoe if the child is laying down, to avoid touching anywhere near the face, hands, or any other areas of the body.
- Once the child awakes, the terminal manager must notify the school and follow their direction on steps for a safe return.

GENERAL PUBLIC & VISITOR ACCESS

In locations that have waiting areas and/or are subject to unplanned or planned visits from the general public, the following guidelines will apply:

- Encourage applicants and the general public to use virtual communication options and avoid in-person visits when possible.
- Post signs advising visitors to stay within a designated area.
- Any materials used by a visitor (such as pens, table, chair, etc.) should be disinfected after each use.
- PPE and hand sanitizer will be made available.
- Social distancing guidelines will be maintained.

APPLICANTS, INTERVIEWS & SCREENING

APPLICANTS & INTERVIEWS

- To reduce traffic in the offices from the general public, applicants should apply online whenever possible.
- Video conferencing technology should be used to conduct interviews whenever possible.
- The following should be considered any time an applicant reports to the terminal in-person for any reason:
 - Applicants should only be scheduled to come on the property at off-peak times.
 - All applicants must wear appropriate PPE while in the facility.
 - Applicants will be directed to a designated location at the facility and not congregate with other employees or in shared areas. This designated location must be properly cleaned before and after each use by the applicant.
 - Any materials used by the applicant (such as pens, table, chair, etc.) should be properly cleaned after each use.

SCREENING & BACKGROUND CHECKS

- Leverage electronic signature and collection whenever possible for company and governmental agency release forms required as part of the background screening process.
- Any forms/releases should be submitted digitally whenever possible. Employees and applicants should be encouraged to wear PPE at all times when submitting documentation in-person to any other agency in connection with the screening process.

MONITORS

- Monitors must wear appropriate PPE according to the **Personal Protective Equipment** guidelines in this plan.
- Monitors that are picked-up off-site must verify that they are following all PPE guidelines when calling in as on-duty.
- Monitors should work with the operations staff to determine the level of PPE required according to the students they are transporting. A monitor on a wheelchair vehicle may need to wear a face shield due to the proximity to the student while securing the wheelchair.
- Monitors must disinfect all equipment after each use (e.g., harness, tie-downs, lift controls, etc.).
- Monitors must ensure that all contaminated PPE is cleaned or disposed of properly.

CHARTERS

For the purpose of this section, the term “Charters” refers to a “Non-school related” trip.

The procedures for charter trips vary by location. Terminal staff should work with their General Manager, Vice President or Senior Vice President to develop guidelines for their location to include social distancing policies for charters, questions asked at time of booking, and the cost associated with pandemic operating protocols. The following are recommendations for all areas:

- At the time of booking, the customer should be instructed that all passengers should self-monitor and not attend the event if they have COVID-19 symptoms.
- At the time of booking, the customer should be instructed that all passengers will be required to wear a face mask while on the vehicle.
- Vehicles should not be loaded beyond the capacity required to allow for social distancing.
- Where possible, vehicles should be loaded from back to front and unloaded in reverse order.
- A log should be kept of the vehicle assigned for each trip and group. This will allow for tracking should we get a report of COVID-19 exposure.
- Any vehicle used for a charter trip should be placed out-of-service until it has been cleaned according to the **Cleaning & Sanitization** guidelines in this plan.

PARK-OUTS & REMOTE LOTS

- Operations staff should ensure that proper PPE is provided to park-out drivers and monitors.
- Park-out drivers and monitors must always wear appropriate PPE according to the guidelines in the **Personal Protective Equipment** section in this plan and must verify they are following the PPE guidelines when calling in as on-duty.
- Drivers and monitors must sanitize the vehicle according to the **Cleaning & Sanitization** guidelines in this plan.
- Drivers without monitors must disinfect all equipment after each use (e.g., car seats, harness, etc.)
- Drivers must verify the vehicle and equipment has been disinfected when calling in as off-duty.
- Operations staff should monitor park-out drivers and monitors to ensure compliance with these guidelines.

DELIVERIES

Items being delivered to the location should be disinfected according to CDC guidelines. Deliveries should be placed in an area isolated from employees where possible until disinfecting can be performed. Where isolation is not possible, deliveries should be disinfected

immediately upon arrival. Delivery drivers should be instructed where to place packages in accordance with these guidelines.

EXPOSURE RESPONSE & REPORTING

For the purposes of this policy, "**close contact**" is defined as anyone who was within six (6) feet of an infected person for at least 15 minutes starting from 48 hours before the person began feeling sick until the time the patient was isolated. This is aligned with the definition of "**close contact**" as provided by the United States Centers for Disease Control and Prevention (CDC), as of the publication of this policy.

SYMPTOM SCREENING & SELF-ISOLATION POLICY

One way to potentially prevent the spread of COVID-19 in the workplace is for employees who are sick, symptomatic, or potentially exposed to COVID-19 to "self-isolate" (i.e., remain home from work) for an appropriate period of time.

The Company requires employees to self-screen for symptoms prior to coming to work on each workday. Before coming to work, employees must assess whether they have had any of the following symptoms in the 72 hours prior to the self-screening:

- A temperature over 100.4 degrees Fahrenheit
- The following **respiratory symptoms**, where not attributed to other health conditions:
 - Dry repeated cough
 - Shortness of breath
 - Difficulty breathing
- The following **non-respiratory symptoms**, where not attributed to other health conditions:
 - Chills
 - Muscle pain
 - Sore throat
 - New loss of taste or smell

Employees who answer "yes" to the above should contact their supervisor immediately and self-isolate (i.e., not report to work) until:

- The employee's fever, if any, has subsided for 72 hours (three full days) without the use of medicine that reduces fever; AND
- Other symptoms have improved; AND
- Ten (10) days have passed since the employee's first symptoms.

Additionally, employees may be required to self-isolate if:

- The employee has been diagnosed with COVID-19 in the last 10 days;
- The employee has been in **close contact** with someone diagnosed with COVID-19; or
- The employee has traveled on a cruise ship or by air in the last 10 days.

Employees who meet any of the above criteria should contact their supervisor immediately to request guidance and instruction on whether to self-isolate.

If required by local re-opening guidelines, All-Star may require employees to undergo a temperature screening prior to beginning work or entering the terminal.

Subject to local policies, employees required to self-isolate who are unable to work from home are permitted to use any accrued paid time off during the period of self-isolation. Employees who do not have paid time off to use will be permitted to take unpaid leave for the period of self-isolation.

RESPONSE GUIDELINES FOR SPECIFIC TYPES OF EXPOSURE

A critical part of any pandemic strategy is staying informed and coordinating with our customers, appropriate health officials, emergency response agencies, and law enforcement. To this end, we have outlined the following guidance for exposure response and reporting.

Employee experiencing COVID-19 like-symptoms

- Employee(s) experiencing symptoms found in the symptom screening and self-isolation policy will stay at home and not report to work until satisfying the requirements found in the **Self-Isolation Policy** allowing them to return to work.
- Employee(s) will provide updates as to their condition. In the event the employee subsequently tests positive for COVID-19, the exposure control/positive test protocols listed below must be implemented.

Employee exposure to confirmed COVID-19 case

- Employee(s) that have been in **close contact** to someone diagnosed with COVID-19 must self-isolate and not report to work until satisfying the requirements in the **Self-Isolation Policy**.
- Any known objects that exposed individual(s) (employees, customers, vendors) have come into **close contact** with will be immediately removed from service and properly cleaned.
- Notify any impacted customer, vendor, or other external party immediately.
- Notify the appropriate health officials in accordance with their requirements.
- Send a summary report to the All-Star COVID-19 email inbox.

- Input the event into the WebRisk COVID-19 log.

Employee tests COVID-19 positive

- An employee that tests positive will self-isolate in accordance with **Self-Isolation Policy**.
- Any known objects that exposed individuals (employees, customers, vendors) have come into **close contact** with will be immediately removed from service and properly cleaned.
- Any additional employee(s) who has had **close contact** with the employee that has tested positive within the last 14 days will self-isolate and not report to work until satisfying the requirements in the **Self-Isolation Policy**.
- Notify any impacted customer, vendor, or other external party immediately.
- Notify county/state health officials in accordance with their requirements.
- Send all applicable information to the All-Star COVID-19 email inbox.
- Input the event into the WebRisk COVID-19 log.

TRAINING

Both initial and ongoing safety training are pivotal for the type of work that we perform daily. That is why it is critical that we consider preventive measures that can be taken to reduce the risk of exposure during the various phases of our training programs. In addition to our standard training program, it is our goal to ensure employee comprehension and understanding of how employees may be exposed to infectious disease, what their responsibilities are, and what protective measures they can take.

Prior to reporting for training, trainees must be instructed in the process of self-assessing for symptoms and how to report for work on their first day of training.

Our training programs include classroom, behind-the-wheel, and various other methods of hands-on training for both new hires and existing employees. The following measures should be applied whenever possible.

CLASSROOM TRAINING & IN-SERVICE MEETINGS

Because classroom training and in-service meetings primarily consists of employees engaged in large groups and in-person sessions, a greater degree of focus must be placed on PPE and social distancing. The following should be implemented for all group classroom/in-service training sessions when possible:

- To limit exposure, make use of blended in-person and distance training models (such as online learning and pre-recorded sessions) for the delivery of training. Online learning must be conducted via Company-approved technology and in accordance with Company policy and regulatory requirements.

- Establish social distancing requirements based on the size of the training facility and enforce these when in-person class sessions are unavoidable. Increasing the number of in-service training sessions may be necessary to account for social distancing.
- Classrooms will be disinfected before and after each use with Company-approved cleaning products.
- PPE must be worn by all trainers and trainees in accordance with the company PPE guidelines (please refer to the **Personal Protective Equipment** guidelines in this plan).
- Avoid cross-contamination of materials by prohibiting the sharing of pens, paperwork, or other materials.

BEHIND-THE-WHEEL

Pre-trip, closed course, and behind-the-wheel training involves trainer-to-trainee interaction in and around our vehicles. The following procedures should be applied whenever possible to mitigate risk of exposure:

VEHICLE SELECTION

- When possible, utilize a dedicated or consistent set of vehicles for training in order to limit the number of people on board vehicles that are used on route. This will further reduce the need to clean vehicles more often than necessary.

PRE-TRIP

- Point at, instead of touching, each component of the vehicle while training in order to avoid unnecessary physical contact. If touching a component is needed, wipe down the vehicle after each occurrence.

CLEANING

- Each vehicle will be equipped with cleaning supplies to be used by the trainer on all high-touch surfaces both before and after each training session.
- Only company approved cleaning products will be permitted on the vehicle for use.

PERSONAL PROTECTIVE EQUIPMENT

- PPE must be worn by all trainers/trainees in accordance with the company PPE guidelines (please refer to the **Personal Protective Equipment** guidelines in this plan).
- When training on board the vehicle, the instructor and trainees must always engage in social distancing. The trainer to trainee ratio should never exceed what is allowable under social distancing guidelines.

TRAINING IN PUBLIC

- Take into consideration the need for restrooms, handwashing facilities, and meal breaks when planning training activities.

- Determine the route to be taken prior to leaving the yard.
- Always engage in strict social distancing whenever disembarking the vehicle in a public setting.

DOCUMENTATION & PAPERWORK

- All paperwork should be handled while wearing gloves.
- A dedicated drop-box should be established for the placement of training paperwork after each session.
- Avoid cross-contamination of materials by prohibiting the sharing of pens, paperwork, or other materials.

COVID-19 & EXPOSURE CONTROL TRAINING & EDUCATION

Elements of our exposure control and prevention training include:

- The operational provisions included in this plan
- Related OSHA (U.S.) documents concerning PPE and exposure control
- Proper use of PPE
- Hygiene and housekeeping measures
- Social distancing and isolation practices
- Assessing for COVID-19 related signs and symptoms
- Exposure/illness reporting procedures
- Sources for additional company information and guidance

MAINTENANCE GUIDELINES

To ensure the safety of our Maintenance employees, a dedicated **Standard Operating Procedure** (SOP) has been developed. Guidelines specific to maintenance-related activities can be found in **Appendix C** of this document. The SOP focuses on the core areas of risk mitigation, and hygiene, social distancing, PPE, and sanitization of the workplace.

COMPLIANCE & CREDENTIALING

As a result of COVID-19, certain safety and compliance activities which previously involved face-to-face contact with employees and various agencies must now be monitored and managed remotely to the extent possible. The COVID-19 Task Force has identified the following compliance areas that must be adapted to ensure ongoing oversight of employee compliance and safety.

DRUG TESTING & PHYSICALS

The following steps shall be taken to limit the risk of exposure to employees when visiting a clinic, occupational health center, or drug testing facility:

- Work with contracted clinics to establish protocols for sending employees to their facilities. Any plans or procedures established by the clinic should be maintained and communicated to employees prior to their appointment.
- Whenever possible, use the paperless physical/drug testing ordering feature within the DSI OnePortal.

SITE SAFETY REVIEWS

Site Safety Reviews are completed using the online portal, iAuditor, and historically are conducted on-site at regular frequency. Due to COVID-19, Site Safety Reviews will not be completed on-site until deemed safe to do so. In lieu of on-site safety reviews, Area and Regional Safety staff will conduct reviews remotely, through video conferencing, email, and online safety systems. Ongoing coordination and collaboration between all affected staff members will be key to the success of this program for the duration the COVID-19 pandemic.

CREDENTIALS

With an increasing number of employees working remotely, it is critical now more than ever that our compliance system be maintained with the most up to date credentials. This will be our only collective means for ensure consistent credentialing compliance.

Please consider implementing the following best practices when collecting and documenting employee credentials to the extent possible:

- Submit required documentation via online portals whenever possible to reduce in person gathering at facilities.
- Any paper documentation that must be collected from applicants/employees should be kept in a designated location.

All relevant regulations and guidance must always be followed related to employee credentials and compliance.

SYSTEMS & TECHNOLOGY

To ensure critical systems remain functional in the event of an outbreak, and to ensure that we are prepared to effectively support employee telecommuting and remote access, we will enhance and/or prepare our systems and information technology infrastructure as follows:

- Ensure email addresses and videoconferencing tools are provided to all employees who require them.
- Enable remote options for document uploads to compliance and credentialing systems.

- Support paperless applications and candidate interviews to prevent disruption to key hiring processes.
- Perform testing to ensure systems and infrastructure are prepared to accommodate remote access without compromised speed or performance.
- Provide support and training materials to employees to communicate all system-related changes that may impact their typical day-to-day processes.

COMMUNICATION

An organization's communication structure is critical to the successful rollout and adoption of any new policy, procedure or program. It is essential that employees across all levels of personnel and functional role are notified of COVID-19 related planning measures, including school start dates and related timelines, procedures, or other guidelines or unique circumstances. We must also ensure that our customers and the stakeholders across our school communities are kept informed as situations develop or evolve, and are made aware of any safety or procedural information as it relates to pandemic response and/or preparedness.

INTERNAL

We have established a comprehensive plan to reach every employee in order to inform them of new standard policies or evolving policies, and guidance affecting our Company as well as to communicate and make clear their responsibilities during an outbreak. Additionally, employees are being provided with communication tools to reach management in order to ask questions, provide input, and to notify leadership and the Company of any needs or changes in absenteeism rates and health status.

EXTERNAL

We have also established a thoughtful approach for communicating with our customers and other stakeholders across our school communities for sharing our capabilities, plans, and any potential delays that may arise as the result of an outbreak. By keeping essential stakeholders effectively informed of policies and procedures as situations develop or evolve, we may be able to help to reduce any unnecessary tensions or concerns related to our Company's pandemic preparedness and response plan.

RECORDKEEPING

We maintain the following records and documentation related to this plan:

- Reports of Exposure
- Symptom Assessment Forms
- Sick Leave/Time Off

- Workers Compensation Claim Records
- Applicable OSHA (U.S.) Plans

PLAN EVALUATION

The COVID-19 Task Force thoroughly evaluates and, as necessary, revises our plan, to ensure effectiveness and prevent or eliminate any plan-related problems.

APPENDICES

We have prepared the following documents for reference and as supplements to this plan:

Appendix A – Operational Return to Service Manager Checklist

Appendix B – COVID-19 Print Materials & Resources

Appendix C – Maintenance Standard Operating Procedures

APPENDIX A: Operational Return to Service Manager Checklist

SOCIAL DISTANCING	Implemented	Not Applicable
CDC guidelines for social distancing communicated to employees		
Physical workspaces/desks assessed, rearranged to ensure distancing		
Breakrooms and common areas closed/limited to decrease traffic		
Social distancing posters hung throughout facility		
Training rooms assessed and setup for social distancing		
General public/applicant area identified and setup		
Establish monitoring and supervision of social distancing in the workplace		
Child Check procedures accounting for social distancing implemented		

CLEANING & SANITIZATION	Implemented	Not Applicable
Obtain pre-approval regarding customer cleaning requirements		
Cleaning and sanitization supplies are procured/stocked		
Establish cleaning schedule of workspaces and high-touch surfaces		
Procedures established to limit sharing of equipment/supplies		
Ensure PPE protocols are followed during cleaning/disinfecting		
Establish cleaning schedule of vehicles - as approved by GM/VP/SVP		

HYGIENE	Implemented	Not Applicable
Handwashing/hygiene supplies are procured and stocked		
Employee training related to hygiene has been delivered		
Hygiene posters hung in common areas/restrooms		

PERSONAL PROTECTIVE EQUIPMENT (PPE)	Implemented	Not Applicable
Obtain pre-approval regarding customer PPE requirements		
PPE supplies approved, procured, and distributed		
Employee training related to PPE has been delivered		

HUMAN RESOURCES & BENEFITS	Implemented	Not Applicable
Employee training related to HR & Benefits topics has been delivered		
Payroll/time keeping procedures implemented		

TERMINAL & OPERATIONAL GUIDELINES	Implemented	Not Applicable
Employee check-in/out procedures established		
Touchless clock-in procedures implemented		
Key & paperwork distribution procedure established		
Student loading & management procedures established		
Signs posted directing visitor access/deliveries		
COVID-19 guidelines established for Charters		
COVID-19 guidelines established for Park-Outs		

EXPOSURE RESPONSE & REPORTING	Implemented	Not Applicable
Customer coordination and notification procedure established		
Response training delivered to staff (internal/external reporting, isolation)		
Symptom screening training and protocol implemented		
Self-isolation training and protocol implemented		
WebRisk logging module reviewed		

TRAINING	Implemented	Not Applicable
Trainers instructed on COVID-19 protocols		
Trainee/Trainer PPE requirements implemented		
Classrooms configured for social distancing		
Classroom sanitization/cleaning schedule established		
Virtual conferencing credentials obtained (virtual classrooms)		
Behind-the-Wheel training procedures implemented		
Documentation/paperwork procedures implemented		

MAINTENANCE	Implemented	Not Applicable
SOP reviewed, implemented, and posted in the shop		

COMPLIANCE & CREDENTIALING	Implemented	Not Applicable
Coordination with clinics established		
Establish contact with local/state/federal agencies related to credentialing (DMV, etc.)		
Employee credentials reviewed to ensure compliance (CDL, MedCard)		

PROCUREMENT	Implemented	Not Applicable
Procedure for ordering COVID-19 materials (PPE/Cleaning) reviewed and implemented		

COMMUNICATION	Implemented	Not Applicable
Completed training on employee text system		
Read guidelines for protocols related to media inquiries		
Provided staff with Return to Service Readiness Checklist (information related to workplace safety and procedural changes)		
New route schedules have been provided to drivers		

APPENDIX B: COVID-19 Print Materials & Resources

PRINT MATERIALS

Operational Return to Service Manager Checklist
Return to Service Readiness Checklist for Drivers & Staff
Maintenance SOP (laminated 8.5x11 sign)
Safety in the Workplace Poster (24x36)
COVID-19 Preventive Measures/Handwashing (laminated 8.5x11 sign)
COVID-19 Exposure Levels/Mask Advocacy (laminated 8.5x11 sign)
Employee Symptom Checker (laminated pocket card)
Onboard Vehicle Student Safety Signs (laminated 8.5x11 sign)
Breakroom and/or Kitchen Signs (laminated 8.5x11 sign)
Applicant/Visitor Signs (laminated 8.5x11 sign)
Delivery Signs (laminated 8.5x11 sign)
Social Distancing Floor Decals

ADDITIONAL RESOURCES

Safety Training Videos
“Welcome Back” Video / Return to Service Video Series

APPENDIX C: Maintenance Standard Operating Procedures

PURPOSE

The purpose of this SOP is to outline and communicate the steps each Maintenance facility should take to reduce exposure to and prevent the spread of COVID-19 in the workplace.

RESPONSIBILITIES

It is the responsibility of the Maintenance Manager/Shop Lead to ensure the communication and enforcement of the included procedures. It is the responsibility of each employee to observe each policy and procedure and to present any questions they may have to their direct supervisor.

PROCEDURES

Personal Protective Equipment

- Masks and gloves will be made available for all technicians.
- Masks must be worn at all times when social distancing cannot be maintained.
- Gloves must be worn when interacting with shared surfaces/tools.

Schedules & Social Distancing

Recommended social distancing guidelines should always be observed in line with current CDC and company guidance. The following should be considered:

- When space allows, the shop should adhere to a 1 technician per service bay policy
- For locations with larger shop staff or locations with limited space, staggering technician schedules should be considered
- When one technician per bay is not feasible due to type of work performed or size of shop, technicians should wear a face covering and gloves.

To encourage adherence to the CDC guidelines for social distancing, full compliance with Company policy allowing *only authorized personnel* in the shop area should be observed at all times.

Disinfection of Vehicles During Repair

Prior to and after repair completion, the following will be cleaned:

- All high-touch points of the vehicle being driven/serviced including but not limited to steering wheel, grab handles and entrance doors, computer workstations, shared tools, and shop equipment.
- When selecting from one of the provided cleaning chemicals, use disinfectants appropriate for the surface being cleaned and read all instructions thoroughly.
 - Pay particular attention to the "wet time", (the amount of time a surface should remain wet with disinfectant after being sprayed); this is especially important in locations where outside temperatures and humidity levels can

affect the cleaning process, and the application of the disinfectant may need to be adjusted for maximum effectiveness.

Computer Workstation, Shared Tooling & Shop Equipment

- Gloves should be worn when working on the shop computer workstation or shared tooling.
- Cleaning of the keyboard, mouse, telephone and other high-touch surfaces should be performed daily.

Paperwork

- Paper usage should be reduced, and electronic forms of paperwork should be utilized when electronic formats are allowed by the state/district in which the work is being performed.
- Gloves should be worn when handling Driver Vehicle Inspection Reports and any other shared paperwork.
- Assign a central location for printed, completed work orders.

Uniforms & Changing Areas

- All dirty uniforms should be kept in an appropriate soiled uniform container.
- All high-touch points in the changing area should be wiped down after each use by the technician using the area.
- Changing areas should only be occupied by one employee at a time.

Driver Vehicle Inspection Reports (DVIR)

A central location should be assigned for depositing DVIR documents with defects.

Deliveries

- A central location should be designated to receive all deliveries and ensure all delivery drivers are informed and understand policy.
- When allowed, the person receiving the delivery should give their last name verbally to "sign off" on the delivery instead of signing paperwork or tablets.
- Delivery paperwork should be handled with gloves and kept in a central location for processing.

Signage

A laminated copy of this SOP should be posted in each shop.



COVID-19 EXPOSURE CONTROL & RESPONSE PLAN FOR CUSTOMERS

All-Star Transportation
146 Huntingdon Avenue
Waterbury, Connecticut 06708
www.all-startransportation.com