The purpose of this plan is to protect WNYIL employees against exposure and disease during an airborne infectious disease outbreak. This plan goes into effect when an airborne infectious disease is designated by the New York State Commissioner of Health as a highly contagious communicable disease that presents a serious risk of harm to the public health. This plan is subject to any additional or greater requirements arising from a declaration of a state of emergency due to an airborne infectious disease, as well as any applicable federal standards.

*Employees should report any questions or concerns with the implementation this plan to the designated contact.*

This plan applies to all “employees” as defined by the New York State HERO Act. This includes any person providing labor or services for remuneration for a private entity or business within the state, without regard to an individual’s immigration status, and shall include part-time workers, independent contractors, domestic workers, home care and personal care workers, day laborers, farmworkers and other temporary and seasonal workers. The term also includes individuals working for digital applications or platforms, staffing agencies, contractors or subcontractors on behalf of the employer at any individual work site, as well as any individual delivering good or transporting people at, to or from the work site on behalf of the employer, regardless of whether delivery or transport is conducted by an individual or entity that would otherwise be deemed an employer under this chapter. The term does not include employees or independent contractors of the state, any political subdivision of the state, a public authority, or any other governmental agency or instrumentality.

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**I. RESPONSIBILITIES**

This plan applies to all employees of WNY Independent Living, Inc. and the following work sites:

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| 3108 Main Street, Buffalo, NY 14214  3080 Main Street, Buffalo, NY 14214 |
| 3158 Main Street, Buffalo, NY 14214  746 Portage Road, Niagara Falls, NY 14301 |
| 750 Portage Road, Niagara Falls, NY 14301  740 Portage Road, Niagara Falls, NY 14301 |
| 319 Main Street, Suite 5, Batavia, NY14020  1199 Harlem Road, Cheektowaga, NY 14227 |
| 2407 Main Street, Warsaw, NY 14569  140 Genesee Street, Lockport, NY 14094 |
|  |

This plan requires commitment to ensure compliance with all plan elements aimed at preventing the spread of infectious disease. The following supervisory employee(s) are designated to enforce compliance with the plan. Additionally, these supervisory employees will act as the designated contacts unless otherwise noted in this plan:

|  |  |  |  |
| --- | --- | --- | --- |
| **Name Title Location Phone** | | | |
| Tina Brown | Chief Human Resource and Compliance Officer | 3080 Main Street, Buffalo, NY 14214 | 716-836-0822 ext. 102. After hours/weekend ext. 318. |
| Becky Usiak | Chief Facilities Management Officer | 3108 Main Street, Buffalo, NY 14214 | 716-836-0822 ext. 128 |
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**II. EXPOSURE CONTROLS DURING A DESIGNATED OUTBREAK**

**A. MINIMUM CONTROLS DURING AN OUTBREAK**

During an airborne infectious disease outbreak, the following minimum controls will be used in all areas of the worksite:

1. **General Awareness:** Individuals may not be aware that they have the infectious disease and can spread it to others. Employees should remember to:

• Maintain physical distancing

• Exercise coughing/sneezing etiquette

• Wear face coverings, gloves, and personal protective equipment (PPE), as appropriate

• Individuals limit what they touch

• Stop social etiquette behaviors such as hugging and hand shaking

• Wash hands properly and often.

2. “**Stay at Home Policy”:** If an employee develops symptoms of the infectious disease, the employee should not be in the workplace. The employee should inform the designated contact and follow New York State Department of Health (NYSDOH)and Centers for Disease Control and Prevention (CDC) guidance regarding obtaining medical care and isolating. “

3. **Health Screening:** Employees will be screened for symptoms of the infectious disease at the beginning of their shift. Employees are to self-monitor throughout their shift and report any new or emerging signs or symptoms of the infectious disease to the designated contact. An employee showing signs or symptoms of the infectious disease should be removed from the workplace and should contact a healthcare professional for instructions. The health screening elements will follow guidance from NYSDOH and CDC guidance, if available

4. **Face Coverings:** To protect our coworkers, employees will wear face coverings throughout the workday to the greatest extent possible. Face coverings and physical distancing should be used together whenever possible. The face covering must cover the nose and mouth, and fit snugly, but comfortably, against the face. The face covering itself must not create a hazard, e.g. have features could get caught in machinery or cause severe fogging of eyewear. The face coverings must be kept clean and sanitary and changed when soiled, contaminated, or damaged.

5. **Physical Distancing:** Physical distancing will be followed as much as feasible. Avoid unnecessary gatherings and maintain a distance of at least six feet (or as recommended by the NYSDOH/CDC for the infectious agent) from each other. Use a face covering when physical distance cannot be maintained.

*In situations where prolonged close contact with other individuals is likely, WNYIL will use the following control methods:*

• restricting or limiting visitor entry

• limiting occupancy

• allowing only one person at a time inside small, enclosed spaces with poor ventilation

• reconfiguring workspaces

• physical barriers

• signage

• floor markings

• activate our work from home plan

• virtual meetings

• preventing gatherings

• restricting travel

• creating new work shifts and/or staggering work hours

• delivering services remotely

6. **Hand Hygiene:** To prevent the spread of infection, employees should wash hands with soap and water for at least 20 seconds or use a hand sanitizer with at least 60% alcohol to clean hands BEFORE and AFTER:

• Touching your eyes, nose, or mouth

• Touching your mask

• Entering and leaving a public place

• Touching an item or surface that may be frequently touched by other people, such as door handles, elevator buttons, tables, phones.

Because hand sanitizers are less effective on soiled hands, wash hands rather than using hand sanitizer when your hands are soiled.

7. **Cleaning and Disinfection:** See Section V of this plan.

8. **“Respiratory Etiquette”:** Because infectious diseases can be spread by droplets expelled from the mouth and nose, employees should exercise appropriate respiratory etiquette by covering nose and mouth when sneezing, coughing or yawning.

9. **Special Accommodations for Individuals with Added Risk Factors:** Some employees, due to age, underlying health condition, or other factors, may be at increased risk of severe illness if infected. Please inform your supervisor or the HR department if you fall within this group and need an accommodation.

**B. ADVANCED CONTROLS DURING AN OUTBREAK**

For activities where the Minimum Controls alone will not provide WNYIL employees with sufficient protection, additional controls outlined below may be necessary.

1. Elimination: NYS guidelines suggest that employers should consider the temporary suspension or elimination of risky activities where adequate controls could not provide sufficient protection for employees. In line with that recommendation, WNYIL will
   1. Suspend all in-person Employee Benefit Fund, fundraising and other group activities
   2. Facilities will close to visitors and non-essential staff
   3. No in-person consumer services will be provided
   4. No travel

2. Engineering Controls:

i. Mechanical Ventilation:

b. General Ventilation, for example:

• Utilize higher-efficiency air filters in the air handling system

• Ensure air and furnace filters are changed/cleaned monthly

ii. Install cleanable barriers such as partitions and/or clear plastic sneeze/cough guards.

Subject to changes based on operations and circumstances surrounding the infectious disease, engineering controls that are anticipated to be used in WNYIL facilities are listed in the following table:

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| --- |
| **Engineering Controls Utilized/Location:** |
| Utilize higher-efficiency air filters in the air handling system whenever possible. |
| Change air conditioning/furnaces air filters monthly |
| Install cleanable barriers such as partitions and/or clear plastic sneeze/cough guards. |
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| *Note to Employer: One of the best ways to reduce exposure to infectious agents is to improve ventilation. The aim is to deliver more “clean air” into an occupied area and exhaust the contaminated air to a safe location. In some cases, the air may have to be filtered before it enters the work area and/or before it is exhausted. Direct the contaminated air away from other individuals and from the building’s fresh air intake ports. Consult your ventilation system’s manufacturer or service company to determine if improvements are possible for your system.* |

3. “Administrative Controls” are policies and work rules used to prevent exposure.

Subject to changes based on operations and circumstances surrounding the infectious disease, the following specific administrative controls are anticipated to be used:

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| **Administrative Controls Utilized/Location:** |
| Increasing the space between workers  Employee training |
| Cross-train employees to ensure critical operations can continue during worker absence  Identify and prioritize job functions that are essential for continuous operations |
| Post signs reminding employees of respiratory etiquette, masks, handwashing  Rearrange traffic flow to allow for one-way walking paths |
| Provide clearly designated entrance and exits |
|  |

4. Personal Protective Equipment (PPE) are devices like eye protection, face shields, and gloves that protect the wearer from infection. PPE will be provided, used and maintained in a sanitary and reliable condition at no cost to the employee. The PPE provided to an employee will be based on a hazard assessment for the workplace and role of the employee.

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| **PPE Required - Activity Involved/Location:** |
| Face Shields – all WNYIL staff have been provided a face shield. |
| Gloves will be made available to all staff who want/need to use them. |
| Washable cloth face coverings will be provided to all employees. |
| Individual hand sanitizer bottles will be provided to all employees for use in their personal work space. |
|  |
| *1 The use of respiratory protection, e.g. an N95 filtering facepiece respirator, requires compliance with the OSHA Respiratory Protection Standard 29 CFR 1910.134 or temporary respiratory protection requirements OSHA allows for during the infectious disease outbreak.*  *2 Respirators with exhalation valves will release exhaled droplets from the respirators. Respirators are designed to protect the wearer. Surgical masks and face coverings, which are not respirators, are designed to protect others, not the wearer.* |

**C. EXPOSURE CONTROL READINESS MAINTENANCE AND STORAGE:**

The controls we have selected will be obtained, properly stored, and maintained so that they are ready for immediate use in the event of an infectious disease outbreak and any applicable expiration dates will be properly considered. Each location identified in this plan will have a two-month supply of materials on site to facilitate the immediate activation of this plan when needed.

**III. HOUSEKEEPING DURING A DESIGNATED OUTBREAK**

**A. Disinfection Methods and Schedules**

Objects that are touched repeatedly by multiple individuals, such as door handles, light switches, water faucet handles, computers, phones, or handrails must be cleaned frequently with an appropriate disinfectant. Surfaces that are handled less often, or by fewer individuals, may require less frequent disinfection.

The disinfection methods and schedules selected are based on specific workplace conditions.

The New York State Department of Environmental Conservation (NYSDEC)and the Environmental Protection Agency (EPA) have compiled lists of approved disinfectants that are effective against many infectious agents (see dec.ny.gov and epa.gov/pesticide-registration/selected-epa-registered-disinfectants). WNYIL will select disinfectants based on NYSDOH and CDC guidance and follow manufacturer guidance for methods, dilution, use, and contact time.

**B. Adjustments to Normal Housekeeping Procedures**

Normal housekeeping duties and schedules will continue to be followed during an infectious disease outbreak, to the extent practicable and appropriate consistent with NYSDOH and/or CDC guidance in effect at the time. However, routine procedures may need to be adjusted and additional cleaning and disinfecting may be required.

Maintenance staff may be at increased risk because they may be cleaning many potentially contaminated surfaces. Some housekeeping activities, like dry sweeping, vacuuming, and dusting, can resuspend into the air particles that are contaminated with the infectious agent. For that reason, alternative methods and/or increased levels of protection may be needed. Rather than dusting, for example, the CDC recommends cleaning surfaces with soap and water before disinfecting them. Conducting housekeeping during “off” hours may also reduce other workers’ exposures to the infectious agent. Best practice dictates that maintenance workers should wear respiratory protection. WNYIL will adjust cleaning methods, schedules and other housekeeping procedures to best meet the needs of the individual WNYIL locations identified in this plan.

WNYIL will take the following additional actions in addition to the normal housekeeping/cleaning procedures:

* sanitize the employee’s work area
* sanitize/clean all public areas daily
* sanitize all elevators/lifts daily
* wipe/clean off all public/common switches/enviromental controls
* sanitize/clean all common area copiers/printers
* sanitize/clean all doorknobs.
* sanitize/clean all meeting rooms twice (2) daily.
* refrigerators
* microwaves (or better yet remove them or prohibit their use)
* clean all public foyers
* restrooms (sinks, toilets, grab bars, towel dispensers, soap dispensers,)

**C. Symptoms**

If an employee develops symptoms of the infectious disease at work, it is ideal to isolate the area in accordance with guidance issued by NYSDOH or the CDC before cleaning and disinfecting the sick employee’s work area. This delay will allow contaminated droplets to settle out of the air and the space to be ventilated. As soon as it is deemed safe, the maintenance staff will thoroughly clean the sick employee’s work area including using a disinfecting fogger. No other staff will be allowed in the area for 24 hours after cleaning and fogging activities have been performed.

**D. Trash Containers**

As feasible, liners should be used in trash containers. Empty the containers often enough to prevent overfilling.

Do not forcefully squeeze the air out of the trash bags before tying them closed. Trash containers may contain soiled tissue or face coverings.

**IV. INFECTION RESPONSE DURING A DESIGNATED OUTBREAK**

If an actual, or suspected, infectious disease case occurs at work, take the following actions:

• Instruct the sick individual to wear a face covering and leave the worksite and follow NYSDOH/CDC guidance.

• Follow local and state authority guidance to inform impacted individuals.

**V. TRAINING AND INFORMATION DURING A DESIGNATED OUTBREAK**

1. **Notification**

The WNYIL Human Resource Team will verbally inform all employees of the existence and location of this Plan, the circumstances it can be activated, the infectious disease standard, employer policies, and employee rights under the HERO Act. (Note: In accordance with NYS guidelines, training need not be provided to the following individuals: any individuals working for staffing agencies, contractors or subcontractors on behalf of the employer at any individual work site, as well as any individual delivering goods or transporting people at, to or from the work site on behalf of the employer, where delivery or transport is conducted by an individual or entity that would otherwise be deemed an employer under this chapter).

1. **Plan Activation**

When this plan is activated, all personnel will receive training which will cover all elements of this plan and the following topics:

1. The infectious agent and the disease(s) it can cause

2. The signs and symptoms of the disease

3. How the disease can be spread

4. An explanation of this Exposure Prevention Plan

5. The activities and locations at our worksites that may involve exposure to the infectious agent

6. The use and limitations of exposure controls

7. A review of the standard, including employee rights provided under Labor Law, Section 218-B.

1. **Training**

The training will be:

1. Provided at no cost to employees and take place during working hours. If training during normal work hours is not possible, employees will be compensated for the training time (with pay or time off).

2. Appropriate in content and vocabulary to your educational level, literacy, and preferred language; and

3. Verbally provided in person or through telephonic, electronic, or other means.

**VI. PLAN EVALUATIONS DURING A DESIGNATED OUTBREAK**

WNYIL will review and revise the plan periodically, upon activation of the plan, and as often as needed to keep up-to-date with current requirements. We will document the plan revisions below:

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| Plan Revision History | | | | | |
| **Date** | **Participants** |  | **Major Changes** |  | **Approved By** |
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**VII. RETALIATION PROTECTIONS AND REPORTING OF ANY VIOLATIONS**

WNYIL, or WNYIL’s agent, or person acting on behalf of WNYIL shall not discriminate, threaten, retaliate against, or take adverse action against any employee for exercising their rights under this plan, including reporting conduct the employee reasonably believes in good faith violates the plan or airborne infectious disease concerns to their employer, government agencies or officials or for refusing to work where an employee reasonably believes in good faith that such work exposes him or her, other workers, or the public to an unreasonable risk of exposure, provided the employee, another employee, or representative has notified the employer verbally or in writing, including electronic communication, of the inconsistent working conditions and the employer’s failure to cure or if the employer knew or should have known of the consistent working conditions.

Notification of a violation by an employee may be made verbally or in writing, and without limitation to format including electronic communications. To the extent that communications between WNYIL and the employee regarding a potential risk of exposure are in writing, they shall be maintained by WNYIL for two years after the conclusion of the designation of a high risk disease from the Commissioner of Health, or two years after the conclusion of the Governor’s emergency declaration of a high risk disease. Employees should contact the Designated Employees identified in Section I. Responsibilities. Should the violation occur during overnight or weekend hours staff should use the after-hours contact extension identified in Section I as well.

2021-08-05