

Public Employer Health Emergency Plan for the **Town of Starkey**

March 11, 2021

This plan has been developed in accordance with NYS legislation S8617B/A10832

Promulgation

This plan has been developed in accordance with the amended New York State Labor Law section 27-c and New York State Education Law paragraphs k and l of subdivision 2 of section 2801-a (as amended by section 1 of part B of chapter 56 of the laws of 2016), as applicable.

This plan has been developed with the input of Town of Starkey Board, as required by the amended New York State Labor Law.

No content of this plan is intended to impede, infringe, diminish, or impair the rights of us or our valued employees under any law, rule, regulation, or collectively negotiated agreement, or the rights and benefits which accrue to employees through collective bargaining agreements, or otherwise diminish the integrity of the existing collective bargaining relationship.

This plan has been approved in accordance with requirements applicable to the agency, jurisdiction, authority, or district, as represented by the signature of the authorized individual below.

As the authorized official of Town of Starkey, I hereby attest that this plan has been developed, approved, and placed in full effect in accordance with S8617B/A10832 which amends New York State Labor Law section 27-c and New York State Education Law paragraphs k and l of subdivision 2 of section 2801-a (as amended by section 1 of part B of chapter 56 of the laws of 2016), as applicable, to address public health emergency planning requirements.

Signed on this day: March 11, 2021

By: George E. Lawson

Signature: 

Title: Supervisor

Record of Changes

Date of Change	Description of Change	Implemented by
	Original	Town of Starkey

Table of Contents

Promulgation.....	1
Record of Changes.....	2
Definitions	4
Purpose, Scope, Situation Overview, and Assumptions	5
Purpose.....	5
Scope	5
Situation Overview.....	5
Planning Assumptions.....	6
Concept of Operations	6
Mission Essential Functions	7
Essential Positions & Functions	7
HEALTH AND SAFETY	9
Remote Work and Staggered Shifts / Workday	9
Time Records	11
Social Distancing.....	11
Personal Protective Equipment (PPE)	11
Employee Personal Hygiene	12
Physical Workspace Cleaning and Disinfection.....	13
Hazard Communication Program	14
Physical Workspace Modifications and Controls	14
Employee and Visitor Health Screening	15
EMPLOYMENT MATTERS	15
Communicable Disease Exposure	15
Employee Leave Time	17
Contact Tracing.....	17
Housing for Essential Employees	18
COMPLAINT RESOLUTION	18

Definitions

For purposes of this Plan, the following terms shall be defined as indicated.

1. **Acceptable Face Covering / Cloth Face Covering** – An acceptable face covering, or cloth face covering can be fashioned from household items or made at home from common materials. The cloth face coverings recommended are not surgical masks or N-95 respirators. Those are critical supplies that must continue to be reserved for healthcare workers and other medical first responders.
2. **Asymptomatic** – A disease is considered “asymptomatic” if a patient is a carrier for a disease or infection but experiences no symptoms. A condition might be asymptomatic if it fails to show the noticeable symptoms with which it is usually associated.
3. **Close Contact** – A person who is in the presence of (within six (6) feet), and is exposed to, a confirmed communicable disease case that is the subject of the public health emergency for a prolonged period of time.
4. **Commonly used** – A location or material object belonging to and/or shared by two (2) or more individuals and/or things and/or by all members of a group.
5. **Communicable Disease** – An illness caused by an infectious agent or its toxins that occurs through the direct or indirect transmission of the infectious agent or its products from an infected individual or via an animal, or the inanimate environment to a susceptible animal or human host.
6. **Contact Tracer** – A properly trained person who works with a patient to help them recall everyone with whom they have had close contact during the timeframe they may have been infectious.
7. **Contact Tracing** – The process of identification of persons who may have come into contact with an infected person ("contacts") and subsequent collection of further information about these contacts. By tracing the contacts of infected individuals, testing them for infection, treating the infected and tracing their contacts in turn, Public Health aims to reduce infections in the population.
8. **Contractor** – Persons who are independent or affiliated with a contracted firm, assigned to work on Town of Starkey owned and operated property are not classified as employees, and as such are not provided with paid leave time, unless required by law.
9. **Critical Service** – A service that, if disrupted, would result in a high or very high degree of injury to the health, safety, security or economic well-being of residents of Town of Starkey, or to the effective functioning of the local government.
10. **Employee** – A person employed by the Town of Starkey, including, but not limited to, an elected official, an appointed official, an appointed member of a board or commission, municipal officer, Department Head, managerial employee, confidential employee, Supervising Authority employee, provisional employee, probationary employee, temporary employee, seasonal employee, trainee, or student intern. This term shall also include contractors wherein employment matters are concerned, with the exception of leave benefits, refer to term “contractor”.
11. **Epidemic** – The rapid spread of disease to a large number of people in a given population within a short period of time.
12. **Essential Employee** – Per S8617B/A10832, “essential employee” is defined as a public employee or contractor that is required to be physically present at a work site to perform his/her job.
13. **Member of the Public** – Means any person other than a Town of Starkey employee. A member of the public may be a client, customer, visitor, vendor, etc.
14. **Non-Essential Employee** – Per S8617B/A10832, “non-essential employee” is defined as a public employee or contractor that is not required to be physically present at a work site to perform his/her job.
15. **Novel Coronavirus** – A new coronavirus that has not been previously identified. The virus causing coronavirus disease 2019 (COVID-19), is not the same as the coronaviruses that commonly circulate among humans and cause mild illness, like the common cold.
16. **Personal Protective Equipment (PPE)** – Personal Protective Equipment (PPE) refers to protective clothing, gloves, face shields, goggles, facemasks and/or respirators or other equipment designed to protect the wearer from injury or the spread of infection or illness.

17. **Pandemic** – An epidemic of an infectious disease that has spread across a large region, for instance multiple continents or worldwide, affecting a substantial number of people.
18. **Remote Access** – Remote access is the ability for an authorized person to access a computer, files, or a network from a geographical distance through a secure network connection. Remote access enables users to connect to the systems they need when they are physically far away.
19. **Retaliatory Action** – The discharge, suspension, demotion, penalization, or discrimination against any employee, or other adverse employment action taken against an employee in the terms and conditions of employment.
20. **Shift Work** – Shift work refers to a work schedule that is performed in rotations. For example, while some employees might fill a role during the day, others might work night or early morning shifts. This means the Town of Starkey operates for 24 hours each day. For the purposes of policy, shift work shall be referred to as shift or shifts.
21. **Social Distancing** – Social distancing, also called “physical distancing,” means keeping space between yourself and other people outside of your home. To practice social or physical distancing:
 - A. Stay at least 6 feet (about 2 arms’ length) from other people.
 - B. Do not gather in groups.
 - C. Stay out of crowded places and avoid mass gatherings.
22. **Symptomatic** – Showing symptoms, or it may concern a specific symptom. Symptoms are signs of disease or injury. They are noticed by the person. Many conditions and diseases have symptoms.
23. **Transmission** – Occurs when an infected person touches or exchanges body fluids with someone else.

Purpose, Scope, Situation Overview, and Assumptions

Purpose

This plan has been developed in accordance with the amended New York State Labor Law section 27-c and New York State Education Law paragraphs k and l of subdivision 2 of section 2801-a (as amended by section 1 of part B of chapter 56 of the laws of 2016), as applicable. These laws were amended by the passing of legislation S8617B/A10832 signed by the Governor of New York State on September 7, 2020, requires public employers to adopt a plan for operations in the event of a declared public health emergency involving a communicable disease. The plan includes the identification of essential positions, facilitation of remote work for non-essential positions, provision of personal protective equipment, and protocols for supporting contact tracing.

Scope

This plan was developed exclusively for and is applicable to Town of Starkey. This plan is pertinent to a declared public health emergency in the State of New York which may impact our operations; and it is in the interest of the safety of our employees and contractors, and the continuity of our operations that we have promulgated this plan.

Situation Overview

On March 11, 2020 the World Health Organization declared a pandemic for the novel coronavirus which causes the COVID-19 severe acute respiratory syndrome. This plan has been developed in accordance with amended laws to support continued resilience for a continuation of the spread of this disease or for other infectious diseases which may emerge and cause a declaration of a public health emergency.

The health and safety of our employees and contractors is crucial to maintaining our mission essential operations. We encourage all employees and contractors to use [CDC Guidance for Keeping Workplaces, Schools, Homes, and Commercial Establishments Safe](#). The fundamentals of reducing the spread of infection include:

- Using hand sanitizer and washing hands with soap and water frequently, including:
 - After using the restroom
 - After returning from a public outing
 - After touching/disposing of garbage
 - After using public computers, touching public tables, and countertops, etc.
- Practice social distancing when possible.
- If you are feeling ill or have a fever, notify your supervisor immediately and go home.

- If you start to experience coughing or sneezing, step away from people and food, cough, or sneeze into the crook of your arm or a tissue, the latter of which should be disposed of immediately.
- Clean and disinfect workstations at the beginning, middle, and end of each shift.
- Other guidance which may be published by the CDC, the State Department of Health, or County health officials.

Planning Assumptions

This plan was developed based on information, best practices, and guidance available as of the March 11, 2021 of publication. The plan was developed to largely reflect the circumstances of the current Coronavirus pandemic but may also be applicable to other infectious disease outbreaks.

The following assumptions have been made in the development of this plan:

- The health and safety of our employees and contractors, and their families, is of utmost importance.
- The circumstances of a public health emergency may directly impact our own operations.
- Impacts of a public health emergency will take time for us to respond to, with appropriate safety measures put into place and adjustments made to operations to maximize safety.
- The public and our constituency expects us to maintain a level of mission essential operations.
- Resource support from other jurisdictions may be limited based upon the level of impact the public health emergency has upon them.
- Supply chains, particularly those for personal protective equipment (PPE) and cleaning supplies, may be heavily impacted, resulting in considerable delays in procurement.
- The operations of other entities, including the private sector (vendors, contractors, etc.), non-profit organizations, and other governmental agencies and services may also be impacted due to the public health emergency, causing delays or other disruptions in their services.
- Emergency measures and operational changes may need to be adjusted based upon the specific circumstances and impacts of the public health emergency, as well as guidance and direction from public health officials and the governor.
- Per S8617B/A10832, 'essential employee' is defined as a public employee or contractor that is required to be physically present at a work site to perform their job.
- Per S8617B/A10832, 'non-essential employee' is defined as a public employee or contractor that is not required to be physically present at a work site to perform their job.

Concept of Operations

The Supervisor of Town of Starkey, their designee, or their successor holds the authority to execute and direct the implementation of this plan. Implementation, monitoring of operations, and adjustments to plan implementation may be supported by additional personnel, at the discretion of the Supervisor.

Upon the determination of implementing this plan, all employees and contractors of Town of Starkey shall be notified by phone, and/or in writing by email and/or mail with details provided as possible and necessary, with additional information and updates provided on a regular basis. Employees, contractors and visitors to the Town Hall and Highway Barn will be notified of pertinent operational changes. This information may be sent using one (1) or more of the following methods, e-mail, phone call, or written letter. The Town of Starkey will maintain communications with the public and constituents as needed throughout the implementation of this plan.

The Supervisor of the Town of Starkey, their designee, or their successor will maintain awareness of information, direction, and guidance from public health officials and the Governor's office, directing the implementation of changes, as necessary.

Upon resolution of the public health emergency, the Supervisor of Town of Starkey, their designee, or their successor will direct the resumption of normal operations or operations with modifications, as necessary.

Mission Essential Functions

When confronting events that disrupt normal operations, Town of Starkey is committed to ensuring that essential functions will be continued even under the most challenging circumstances.

Essential functions are those functions that enable an organization to:

- Maintain the safety of employees, contractors, and our constituency.
- Provide vital services.
- Provide services required by law.
- Sustain quality operations.
- Uphold the core values of Town of Starkey.

The Town of Starkey has identified as critical only those priority functions that are required or are necessary to provide vital services. During activation of this plan, all other activities may be suspended to enable the organization to concentrate on providing the critical functions and building the internal capabilities necessary to increase and eventually restore operations. Appropriate communications with employees, contractors, our constituents, and the public will be an ongoing priority.

Essential functions are prioritized according to:

- The time criticality of each essential function
- Interdependency of a one function to others
- The recovery sequence of essential functions and their vital processes

Priority 1 identifies the most essential of functions, with priority 4 identifying functions that are essential, but least among them.

Essential Positions & Functions for Town of Starkey have been identified as:

Each essential function identified requires certain positions on-site to effectively operate. The table below identifies the positions or titles that are essential to be staffed on-site for the continued operation of each essential function. [Note that while some functions and associated personnel may be essential, some of these can be conducted remotely.

**It is important to note that Justice Court is a vital component of town government, with Justice Court functions budgeted and supported by the Town Board and Town Supervisor. However, we recognize that the New York State Office of Court Administration holds dominion over Justice Courts and, as such, may issue orders which suspend or alter the hours of operation or means by which Justice Courts operate, which may not fully align with this plan or other measures taken by the Town Board or Town Supervisor. As such, the Town Board, Town Supervisor, and Town Clerk will coordinate as necessary with Justice Court personnel to ensure safe and effective continuity of town Justice Court.

Essential Positions	Functions	Priority
Assessor	Primary function is to fairly assess all real property in the Town of Starkey for the fair equitable distribution of all applicable taxes per Real Property Tax Law.	1
Assessor Aide	Must be able to execute administrative responsibility of the Assessor in his/her absence.	1
Bookkeeper	Responsible for the payment of bills in a timely manner, payroll and payroll functions and maintaining journal entries in accounting system as well as monitors cash flow. The bookkeeper would need to work in the office on payroll weeks. Most of the job duties are performed from paper copy information that is created. <i>[note: Employee may perform some duties remotely, but is required to be in the building at least part-time]</i>	1
Building Maintenance	Must be on site to oversee that all buildings are maintained for all town functions. Must be on site to keep all buildings and systems in good repair for all county functions.	3
Cleaner	Must be on site to keep all Town of Starkey buildings clean and disinfected for safe occupancy of all employees as well as the public.	4
Code Enforcement Official	NYS law requires the office of the Code Enforcement Official to be open for the conduct of business. As the Code Enforcement Official, his/her presence is required. Paperwork filed in the Code Enforcement Office requires hardcopy format, the employee's physical presence is required in the office to handle these transactions/transfers.	1
Court Justice **	The Court Justice's office is the chief law enforcement office of the Town of Starkey. Under the Constitution and laws of the State of New York, the Court Justice office is responsible for hearing cases and rendering decisions on offenses committed in the Town of Starkey. Answering and responding to phone calls must be done in office. Mailing and filing of documents with the Courts and/or other attorneys require access to the building. If in person appearances are still permitted, the Town Justice will need to be present for all such appearances.	1
Court Justice Clerk **	Must be able to execute administrative responsibility of the Court Justice in his/her absence, as assigned.	1
Highway Superintendent	Must be on-site for weather and other highway maintenance issues in order to keep roadways available for the traveling public and emergency response. Responsible for communication with office staff, management staff and field personnel. Communication and planning with other county department heads for assistance by the highway department. <i>[note: Employee may perform some duties remotely, but is required to be in the building at least part-time]</i>	1
Deputy Highway Superintendent	In the absence of the Superintendent, the deputy would need to oversee operations within the highway department. Should there be a rotating shift, the deputy would rotate with the Superintendent. <i>[note: Employee may perform some duties remotely, but is required to be in the building at least part-time]</i>	2
Heavy Equipment Operator (HEO)	Performs daily highway maintenance including snow removal/emergency response to weather-related incidents/keep roadways available for traveling public and emergency response.	1
Motor Equipment Operator (MEO)	Performs daily highway maintenance including snow removal/emergency response to weather-related incidents/keep roadways available for traveling public and emergency response.	1

Essential Function	Description	Priority
Highway Typist	The administrative assistant would need to work in the office on payroll weeks. The majority of the job duties are performed from paper copy information that is created by field personnel and the repair shop. <i>[note: Employee may perform some duties remotely, but is required to be in the building at least part-time]</i>	1
Planning Board	Operation requires the Planning Board council, be open for the conduct of business. All positions within the Planning Board council, are considered "Non-Essential". It shall be noted that the councilpersons themselves are considered "Essential", and at times the Code Enforcement Official will be required to be in the office to assist with town operations.	4
Town Supervisor	Responsible for ensuring the continuation of operations of all town departments and services. Additionally, the Town Supervisor will respond to inquiries from the media and members of the public, conduct briefings with stakeholders, as necessary. The Town Supervisor will maintain both an onsite presence as well as remote work assignment as the circumstances dictate.	1
Town Clerk	NYS law requires the office of the Town Clerk to be open for the conduct of business. As the office administrator, the presence of the Town Clerk is required. Paperwork filed in the Town Clerk's Office requires hardcopy format, the employee's physical presence is required in the office to handle these transactions/transfers.	1
Town Clerk Deputy	Must be able to execute every administrative responsibility of the Town Clerk in his/her absence.	2
Town Council	NYS law requires the office of the town council, be open for the conduct of business. All positions within the Town Council are considered "Non-Essential". It shall be noted that the councilpersons themselves are considered "Essential", and at times the town clerk will be required to be in the office to assist with town operations.	4
Zoning Board of Appeals	Operation requires the Zoning Board of Appeals council, be open for the conduct of business. All positions within the Zoning Board of Appeals council are considered "Non-Essential". It shall be noted that the councilpersons themselves are considered "Essential", and at times the Code Enforcement Official will be required to be in the office to assist with town operations.	4

HEALTH AND SAFETY

The health and safety of the Town of Starkey employees is crucial to maintaining our mission essential operations. The fundamentals of reducing the spread of infection include but are not limited to:

1. Using hand sanitizer and washing hands with soap and water frequently.
2. Practice social distancing when possible.
3. When an employee feels ill or has a fever, he/she shall notify his/her supervisor immediately and go home.
4. When an employee starts to experience coughing or sneezing, step away from people and food, cough or sneeze into the crook of your arm or tissue.
5. Clean and disinfect workstations frequently.
6. Other Guidance published by the CDC, the New York State Department of Health, or County health officials.

Remote Work and Staggered Shifts / Workday

It is the policy of Town of Starkey that it may be necessary for the health and safety of all employees, the efficient operation of the Town, and the delivery of services to residents of the Town that employees may be allowed to work remotely or in staggered shifts.

1. **Statement of Purpose** - Through assigning certain employees to work remotely and by staggering work shifts, the Town of Starkey can decrease the workforce density, ultimately reducing employee risk to exposure and preventing the spread of infectious disease.
2. **Remote Work** – Non-essential and essential employees able to accomplish their functions remotely will be enabled to do so at the greatest extent possible. Working remotely requires:
 - A. **Exempt (Salary) Employees** – Exempt (Salary) Employees are eligible to work remotely with Town Board/Supervisor approval. Employees must adhere to the same accurate workday time reporting requirements, including meal periods.
 - B. **Non-exempt (Hourly) Employees** – Non-exempt (hourly) employees are eligible to work remotely with Department Head approval. Employees must adhere to the same accurate workday time reporting requirements, including meal periods. While working remotely, non-exempt employees are still subject to Town of Starkey and/or departmental policy and procedures for working hours beyond the typical workday of seven (7), eight (8) or ten (10) hours (Refer to Time Records).
3. **Remote Access** – Employees who receive prior approval may be supplied with approved devices with remote access software that allows for secure access. Non- Town of Starkey -provided computers are not allowed to access the Town of Starkey network for any reason, unless the access is provided by Town of Starkey in a public manner, such as web-based e-mail.
4. **Paper Materials and Mail Handling Procedures** – It shall be the responsibility of each Department Head to establish and implement a procedure within his/her own department to ensure paper materials and mail are distributed to employees working remotely as needed, keeping in mind the Health Insurance Portability and Accountability Act of 1996 (HIPPA).
5. **Individual Employee Equipment Assessment and Maintenance** –
 - A. Department Heads shall identify and maintain the equipment needs for the non-essential employees within their own department.
 - B. The list of the employee's equipment needs shall be audited at a minimum, one (1) time per calendar year and/or as adjustments are needed as it relates to new hires and separations. The audited list shall be submitted to the Town Clerk.
 - C. The Town Clerk and/or his/her designee shall be responsible for maintaining a master list of the identified equipment.
 - D. The Town of Starkey Board will use this data to determine the tools and resources each non-essential and/or essential employee may need to work remotely.
6. **Staggered Shifts / Workdays** –
 - A. **Implementation** – Implementing staggered shifts / workdays may be possible for employees performing duties which are necessary to be performed on-site but perhaps less sensitive to being accomplished only within core business hours. As possible, Department Heads will identify opportunities for employees to work outside core business hours as a strategy of limiting exposure. Regardless of changes in start and end times of shifts, the Town of Starkey will ensure that employees are provided with their typical or contracted minimum work hours per week. Preparing for staggered shifts shall require:
 - a. Identification of positions for which work hours will be staggered.
 - b. Approval and assignment of changed work hours.
 - B. **Department Specific Procedures** –
 - a. **One (1) Employee** – For Departments with only (1) employee this section will not apply. The employee will be responsible to report to work daily unless determined by state or local government laws, executive order, etc.
 - b. **Two (2) Employees** – For Departments with two (2) or less employees, a staggered shift / workday, will consist of the department working at a fifty (50%) percent reduction in workforce. The Department Head will be responsible for managing the schedule.
 - c. **Three (3) or more Employees** – For departments with three (3) or more employees, the Department Head is responsible for establishing departmental procedures for a reduction in

workforce density, unless employee levels are otherwise stipulated by law (Refer to the Department Specific Restoration of Operations Plans and/or Department Specific Pandemic Continuity of Operations Plan for further information).

Time Records

In a public health emergency, it may be necessary to document work hours and locations of each employee to support contact tracing efforts. Identification of locations shall include on-site work and off-site visits. This information may be used by the County to support contact tracing within the workforce and may be shared with local public health officials.

Methods – Employees shall record time by using one of the following Time Clock Plus recording methods:

- Time Clock Station
- Web Clock

Social Distancing

To ensure that employees comply with social distancing requirements, the Town of Starkey has established the following guidelines:

Social Distancing Minimum Requirements –

- A. Employees shall maintain a minimum of six (6) feet distance between one another unless safety and/or core function and/or work activity requires a shorter distance.
- B. Any time employees are less than six (6) feet apart from one another, employees must wear acceptable face coverings.
- C. Building and Grounds employees shall properly denote six (6) feet of spacing in commonly used and/or other applicable areas, including but not limited to, Time Clock stations, lobby health screening stations, mailroom, breakrooms, copiers, etc.
- D. Access to commonly used rooms and/or spaces will be reduced or limited. Signage will be posted on the door indicating the allowable occupancy for that particular location.
- E. In-person gatherings will be limited as much as possible and the use of tele-conferencing or video-conferencing applications will be utilized whenever possible
- F. Unavoidable essential in-person meetings should be held in open, well-ventilated spaces with appropriate social distancing (minimum of six (6) feet) among participants. Signage indicating the allowable occupancy for that particular location will be posted on the entrance. If the occupancy of a particular location is not clearly indicated, please consult with your Department Head/Supervising Authority
- G. Employees who are able to use the Web Clock and can clock in/out on his/her own computer at his/her own designated workstation or office must do so as opposed to using the actual Time Clock. Employees who have the capability of clocking in/out using a touchless method are exempt from having to use Web clock.

Personal Protective Equipment (PPE)

The purpose for using personal protective equipment (PPE) is to protect the Town of Starkey employees from exposure to workplace hazards and the spread of infectious disease.

- A. **Personal Protective Equipment (PPE)** – The use of PPE to reduce the spread of infectious disease is important to supporting the health and safety of our employees. PPE may include but is not limited to:
 - Masks
 - Face shields
 - Gloves
- B. **Distribution of Personal Protective Equipment (PPE)** – PPE shall be provided, used, and maintained when it has been determined that its use is required to ensure the safety and health of Town of Starkey employees and that such use will lessen the likelihood of spreading an infectious disease.
 1. Employees may be required to wear PPE dependent on their job duties and various types of activities they perform.

2. Department Heads who have identified the need for employees to use PPE have created procedures regarding when employees must wear the identified PPE.
 3. PPE will be provided to employees who are required to wear it as a result of his/her job duties, at no cost to the employee.
 4. Employees required to wear PPE will be trained on when to use PPE, what PPE is necessary, how to properly don, use, and doff PPE, and how to properly dispose of PPE.
- C. **Personal Protective Equipment (PPE) Procurement –**
1. As specified in the amended law, the Town of Starkey must be able to provide at least two (2) pieces of each required type of PPE to each essential employee during any given work shift for a time period not less than six (6) months.
 - a. A Department Head and/or his/her designee shall identify the need for PPE for his/her employees within the department based upon job duties and work location.
 - For the purposes of developing this plan, Department Heads have preliminarily determined the PPE needs for their departments and the information has been compiled all together, for reference.
 - b. Each Department Head and/or his/her designee shall consult with the Supervisor and/or Town Clerk on the departments' PPE needs.
 - c. The Supervisor/Town Clerk shall be responsible for procuring the agreed upon PPE in accordance with the Town of Starkey's Purchasing and Procurement Policy.
 2. Supply and Demand – The Town of Starkey shall be prepared and anticipate potential supply chain disruptions.
- D. **Storage, Access, and Monitoring of Personal Protective Equipment (PPE) Inventory –** The Town of Starkey shall procure and store a supply of PPE designated for public health emergencies. PPE storage procedures shall consist of but are not limited to:
1. PPE shall be stored in the Town of Starkey, Town Hall located at 40 Seneca Street, Dundee, NY
 2. PPE shall be stored in a manner which will prevent degradation.
 3. Due to the central location employees shall have immediate access to PPE in the event of an emergency.
 4. The Town Clerk and/or his/her designee shall monitor the supply of PPE supply to ensure integrity, track usage rates and maintain ample inventory.

Employee Personal Hygiene

Employees shall follow preventive measures while at work and home, such as practicing healthy personal hygiene and avoiding close contact with others (social distancing). Employees are asked to act responsibly to sustain a healthy and safe work environment.

Spread of Infection – In order to maintain continuity of operations, preserving the health and safety of Town of Starkey employees is imperative. Employees are encouraged to follow fundamental guidelines for reducing the spread of infection which may include but are not limited to:

A. Handwashing –

1. Wash your hands frequently with soap and water for at least twenty (20) seconds especially after you have been in a public place. Key times to clean hands include, but are not limited to:
 - After blowing your nose, coughing, or sneezing
 - After using the bathroom
 - Before eating or preparing food
 - After touching an animal, animal feed or animal waste
 - Before and after providing routine care for another person who needs assistance (for example, a child)
 - Before and after treating a cut or wound
 - After handling trash

- After cleaning activities
 - After using public transportation
2. If soap and water are not readily available, use a hand sanitizer that contains at least sixty percent (60%) alcohol. Cover all surfaces of your hands and rub them together until they feel dry.
 3. Avoid touching your eyes, nose, and mouth with unwashed hands.
- B. Cover Coughs and Sneezes –**
- Cover your mouth and nose with a tissue when you cough or sneeze.
 - Throw used tissues in the trash.
 - If you do not have a tissue, cough or sneeze into your elbow, not your hands.
 - Wash your hands often with soap and water for at least 20 seconds especially after you have been in a public place, or after blowing your nose, coughing, or sneezing.
- C. Monitor Your Health –**
1. Follow CDC guidance if symptoms develop.
 2. Be alert for symptoms. Watch for fever, cough, shortness of breath, or other symptoms.
 3. Take your temperature if symptoms develop.
 4. Don't take your temperature within thirty (30) minutes of exercising or after taking medications that could lower your temperature, like acetaminophen.

Physical Workspace Cleaning and Disinfection

The CDC and public health guidelines shall be followed for cleaning and disinfection of surfaces, workspaces, areas, etc. By using appropriate cleaning and disinfection methods routinely, it may help prevent the spread of infection. Suggested guidance for routine cleaning and disinfection during a public health emergency includes but is not limited to:

1. **Cleaning Responsibility –** Employees within the Buildings and Grounds Department are responsible for the cleaning and disinfection of high traffic, high touch areas and areas accessible to the public.
 - A. The following positions are responsible for cleaning and disinfection.
 - Cleaner (weekly)
 - B. Employees responsible for cleaning and disinfecting areas will be issued and required to wear task appropriate PPE.
 - C. High traffic/high touch areas and areas accessible to the public will be disinfected at least every (1) hour.
2. **High Touch/High Traffic/Public Areas –**
 - A. Frequently touched surfaces in public areas may consist of but are not limited to:

<ul style="list-style-type: none"> • Bathrooms (sinks, faucet, toilet handles, etc.) • Doorknobs • Drinking fountains 	<ul style="list-style-type: none"> • Elevator buttons • Floors • Handrails • Light switches
---	---
 - B. Any public space in a department/office shall be clear of communal magazines, pamphlets, pens, etc.
3. **Individual Workspace / Office –**
 - A. Employees are responsible for cleaning and disinfecting all frequently touched surfaces in their own office/workspace. Frequently touched surfaces may include but are not limited to:

<ul style="list-style-type: none"> • Chair 	<ul style="list-style-type: none"> • Desk 	<ul style="list-style-type: none"> • File drawers
---	--	--
 - C. An employee's workspace shall be kept clean to promote a clean and healthy work environment.
 - D. Employees are encouraged to disinfect/wipe down their office/workspace in the beginning, middle, and end of their normal workday, at minimum. Cleaning frequency may vary depending on work location and the frequency of public interaction.

- E. Employees should not use other employee phones, desks, offices and/or other tools and equipment, when possible.
- 4. **Shared Areas / Objects –**
 - A. In conference rooms and meeting spaces, social distancing shall be maintained, and the room shall be cleaned after each use. The Town of Starkey encourages alternatives to in-person meetings, such as virtual meetings and conference calls.
 - B. If an employee uses a common area office supply, it shall be disinfected with a sanitizing wipe and/or the provided cleaning supplies.
- 5. **Town Vehicles –** Vehicles must be disinfected with every new driver/passenger.
 - A. Highway personnel will continue to maintain the Town of Starkey Garage vehicles by routine cleaning and maintenance. Additional attention will be given to frequently touched surfaces and objects that are often touched by the driver and passengers.
 - B. Individual employees who utilize a Town of Starkey vehicle shall wipe down the frequently touched areas in the vehicle after each use with the provided cleaner. Frequently touched areas to be cleaned include but are not limited to:
 - Door handles
 - Window buttons
 - Door locks
 - Arm rests
 - Seat cushions
 - Buckles and seatbelts
 - Steering wheel
 - Radio buttons
 - Turn signals
 - Cup holders
- 6. **Electronic Devices –**
 - A. A hand sanitizing station shall be made available and located near electronic devices commonly shared between employees, such as copiers, phones, postage machines, etc. Employees shall apply hand sanitizer before and after each use of the device to help prevent the spread of infection.
 - B. Cleaning products are not to be sprayed on electronic devices or equipment as it could potentially cause damage.
- 7. **Cleaning and Disinfecting Supplies –**
 - A. The Coronavirus pandemic demonstrated that supply chains were not able to keep up with increased demand for cleaning supplies used to sanitize surfaces, as well as hand soap and hand sanitizer early in the pandemic. As such, the Town of Starkey shall treat cleaning and disinfecting supplies in correlation with PPE supply procurement (See Personal Protective Equipment)
 - B. Surfaces shall be disinfected with products that meet Environmental Protection Agency (EPA) criteria for use against the virus in question.
 - C. Cleaning products shall be used as instructed to ensure safe and effective use.

Hazard Communication Program

It is the policy of the Town of Starkey to provide a safe and healthy work environment that complies with all Federal, State, and local laws regarding hazard communication.

Employees may be requested to utilize cleaning supplies and/or other supplies that contain hazardous chemicals to help ensure a safe a healthy environment for the Town of Starkey workforce.

Physical Workspace Modifications and Controls

In workspaces where appropriate physical modifications and controls may be implemented to reduce exposure to hazards without relying on the behavior of Town of Starkey employees and/or members of the public.

At the public entry point of all Town of Starkey buildings members of the public shall be required to sign-in upon entry (refer to Employee and Visitor Health Screening).

- 1. **Employee Interaction(s) –**

- To ensure social distancing within departments, employees are encouraged to limit in-person direct contact where feasible.
 - Employees are to utilize the desktop phones or email for intradepartmental/interdepartmental correspondence, rather than in-person meetings.
 - Office spaces are to be occupied by the employee whose office it is.
 - Should an employee need to enter another employee's office for work related purposes, he/she must wear a mask and/or there must be adequate spacing to accommodate social distancing of a minimum of six (6) feet.
 - Employees shall not share any supplies, phone, computer, etc. or obtain supplies from another employee's office.
 - Unless otherwise designated, employees are to stay no closer than the doorway of another employee's office.
 - If an employee must go to another department, such employee is to call the person they intend to visit to ensure he/she is in his/her office and available.
 - Employees shall make appointments with employees in other departments to facilitate readiness of the workspace for social distancing.
 - Employees are discouraged from visiting other employees and/or departments for non-work-related matters.
 - Common spaces should only be used for necessary in person meetings. In these areas, please maintain social distancing and a face covering/mask must be worn. Employees shall follow the capacity postings for common areas where applicable.
2. **Town Hall Reception** – The Town of Starkey may temporarily designate a checkpoint at the main entrance of the building and assign personnel as needed to work as a safeguard (refer to Contact Tracing).

Employee and Visitor Health Screening

To reduce the risk of exposure during a public health emergency in the workplace, the Town of Starkey has prepared and implemented basic infection prevention measures to promptly identify and isolate potentially sick Town of Starkey employees and members of the public.

1. **Policy Statement** – It is the policy of Town of Starkey to comply fully with the advice from the Centers for Disease Control and Prevention (CDC) and other public health authorities on appropriate steps to take relating to the workplace regarding communicable disease. Additionally, the Town of Starkey will continue to monitor the Equal Employment Opportunity Commission (EEOC) regarding best practices for balancing obligations under the Americans with Disabilities Act (ADA).
2. **Health Assessment** – Pursuant to CDC guidance issued during a public health emergency, the Town of Starkey may request employees and/or visitors to undergo a health assessment prior to coming on Town of Starkey owned and operated property.

EMPLOYMENT MATTERS

Communicable Disease Exposure

Employee exposures to a communicable disease during a public health emergency shall be categorized based upon the type of exposure and presence of symptoms. Following CDC guidelines, the Town of Starkey has established the following procedures:

1. **Close Contact Exposure** –
 - A. Potentially exposed employees who do not have symptoms should remain at home, or in a comparable setting, and practice social distancing for no less than ten (10) days or other current CDC/public health guidance for the communicable disease in question.
 - B. As possible, these employees will be permitted to work remotely during this period if they are not ill (refer to Contact Tracing)
2. **Symptomatic Employee Exposure** –

- A. Employees who exhibit symptoms of the communicable disease that is the subject of the public health emergency, in the workplace, shall be immediately separated from other employees, customers, and visitors.
 - B. Employees shall be sent home from work immediately with a recommendation to contact their healthcare provider.
 - C. Employees shall not return to the workplace until they have met the criteria to discontinue home isolation per CDC/public health guidance and have consulted with a healthcare provider.
 - D. In order to return to work, employees shall provide the Town of Starkey with the required documentation in accordance with requirements set forth by the CDC/public health and/or state or federal government.
 - E. CDC criteria for COVID-19 provides that persons exhibiting symptoms shall return to work if at least twenty-four (24) hours have passed since the last instance of fever without the use of fever-reducing medications. If the disease in question is one other than COVID-19, CDC and other public health guidance shall be referenced.
 - F. As possible, these employees will be permitted to work remotely during this period if they are not ill (refer to Remote Work and Staggered Shifts/Workday).
3. **Positive Employee Exposure –**
- A. Employees who test positive for the communicable disease that is the subject of the public health emergency shall be immediately separated from other employees, customers, and visitors, if applicable
 - B. Employees shall be sent home from work immediately with a recommendation to contact their healthcare provider, if applicable
 - C. Employees shall not return to the workplace until they have met the criteria to discontinue home isolation per CDC/public health guidance and have consulted with a healthcare provider.
 - D. Areas occupied for prolonged periods of time by the subject employee will be closed off.
 - 1. CDC guidance for COVID-19 indicates that a period of twenty-four (24) hours is ideally given before cleaning, disinfecting, and reoccupation of the areas in question. If this time period is not possible, a period of as long as possible shall be given. CDC/public health guidance for the disease in question shall be followed.
 - 2. Any common areas entered, surfaces touched, or equipment used shall be cleaned and disinfected immediately.
 - E. Contact Tracing - Identification of potential employee exposures will be conducted.
 - 1. If an employee is confirmed to have the disease in question, a public health official or their designee shall inform all contacts of their possible exposure.
 - 2. Employees who are named as a close contact shall follow the appropriate guidance.
 - F. As possible, these employees will be permitted to work remotely during this period if they are not ill (refer to Section Remote Work and Staggered Shifts/ Workday).
4. **Critical Essential Employee Exposure –** During the COVID-19 Pandemic, CDC guidelines provided that critical essential employees may be permitted to continue working following potential exposure, provided they remain symptom-free and additional precautions are taken to protect them, other employees and/or members of the public.
- A. As possible, these employees will be permitted to work remotely during this period of time if they are not ill (refer to Remote Work and Staggered Shifts/ Workday), unless working from home would adversely impact essential services or functions, including critical essential employee infrastructure in New York or the response to the public health emergency.
 - B. Additional precautions will include the requirement of the employee, as well as others working in their proximity, to always wear appropriate PPE to limit the potential of transmission.
 - C. In-person interactions with the exposed employee will be limited as much as possible
 - D. Work areas in which the subject employee is present will be disinfected according to current CDC/public health protocol at least every one (1) hour, as practical (refer to Physical Workspace Cleaning and Disinfection).

5. **Exposure Notification/Communication Procedure –**
 - A. Regardless of the category for exposure, the affected employee shall notify his/her Department Head/Supervising Authority immediately of the circumstances surrounding his/her exposure to the communicable disease in question.
 - B. The Department Head/Supervising Authority shall notify the Supervisor/Town Clerk to ensure procedures are followed.
6. **Exposure Disclaimer –** The Town of Starkey recognizes there may be nuances or complexities associated with potential exposures, close contacts, symptomatic persons, and those who tested positive. CDC/public health recommendations and requirements will be followed and in addition, the Yates County Public Health Department for guidance and support, as needed.

Employee Leave Time

Public health emergencies are extenuating and unanticipated circumstances, as such, the Town of Starkey is committed to reducing the burden on our employees.

1. **Families First Coronavirus Response Act (FFCRA) –** The U.S. Department of Labor established the FFCRA in response to the COVID-19 pandemic and set forth the following requirements:
 - A. Two (2) weeks, up to eighty (80) hours of paid sick leave at the employee's regular rate of pay where the employee is unable to work because the employee is quarantined (pursuant to Federal, State, or local government order or advice of a health care provider), and/or experiencing COVID-19 symptoms and seeking a medical diagnosis, or
 - B. Two (2) weeks up to eighty (80) hours of paid sick leave at two-thirds (2/3) the employee's regular rate of pay because the employee is unable to work because of a bona fide need to care for an individual subject to quarantine (pursuant to Federal, State, or local government order or advice of a health care provider), or care for a child (under eighteen (18) years of age) whose school or child care provider is closed or unavailable for reasons related to COVID-19, and/or the employee is experiencing a substantially similar condition as specified by the Secretary of Health and Human Services, in consultation with the Secretaries of the Treasury and Labor.
 - C. Up to an additional ten (10) weeks of paid expanded family and medical leave at two-thirds (2/3) the employee's regular rate of pay where an employee is unable to work due to a bona fide need for leave to care for a child whose school or childcare provider is closed or unavailable for reasons related to COVID-19.
2. **New York State COVID-19 Paid Sick Leave –** Under legislation signed by Governor Cuomo, New York workers were guaranteed job protection and financial compensation while on a mandatory or precautionary quarantine order due to COVID-19. Specifically, employees were entitled to at least fourteen (14) days of paid sick leave.
3. **Policy –**
 - A. It is the policy of Town of Starkey to follow federal and/or New York State orders should an employee be unable to work due to quarantine and/or experiencing symptoms and seeking a medical diagnosis.
 - B. In the event there is no current federal and/or New York State orders for paid sick leave the Town of Starkey will defer to the sick leave policies in the Employee Handbook.
 - C. Additional provisions may be enacted based upon need, guidance, and requirements in place by:
 1. Family and Medical Leave Act
 2. Federal and NYS Employment Laws
 3. Federal and NYS Executive Orders
 4. Other potential sources.

Contact Tracing

Contact tracing may slow the spread of a communicable disease. During a public health emergency New York State or local public health officials may implement contact tracing to help protect individuals by making them aware they may have been exposed to the communicable disease and should monitor their health for signs and symptoms.

1. **Employment Based Contact Tracing** – As was done during the COVID-19 Pandemic, the Yates County Public Health Department shall identify individuals made up of Town of Starkey employees and members of the public who shall act as “Contact Tracers”, in the event an employee tests positive. Yates County Public Health Department, the assigned contact tracers and the Supervisor/Town Clerk will work together to identify and notify close contacts within the Town of Starkey workforce.
2. **Visitor Based Contact Tracing / Entrance Log** – At the public entry point of all Town of Starkey owned and operated buildings, members of the public will be required to sign-in upon entry. In addition to his/her name, the individual will be required to include his/her phone number date he/she was there and the department or departments he/she is visiting.
 - A. **Building Log** – The Town Clerk will be responsible for collecting and retaining the Building log each day.
 - B. **Highway Barn Log** – The logs for the Highway Barn facilities will be turned in to the Town Clerk once weekly, for retention.
 - C. **Court** – The Town of Starkey Justice Court visitor tracking is maintained by employees of the 7th Judicial District of the New York State Unified Court System and in accordance with guidelines issued by the district office.

Housing for Essential Employees

There are circumstances within a public health emergency when it may be prudent to have essential employees lodged in such a manner which will help prevent the spread of the subject communicable disease to protect these employees from potential exposures, thus helping to ensure their health and safety and the continuity of Town of Starkey operations.

1. **Procedure** –
 - A. Hotel rooms located within the area present as the most viable option for the Town of Starkey.
 - B. In matters where hotels located within the area are unavailable and/or have no vacancy, the Department Head in consultation with the Town of Starkey Supervisor will coordinate with the Director of Emergency Management to help identify and arrange for the Town of Starkey’s housing needs.

COMPLAINT RESOLUTION

Complaint Resolution

A set of procedures has been established to provide employees, members of the public, visitors, etc. who frequent County owned property with a clear and definitive process to follow should one feel his/her safety has been compromised.

1. **Definition of Complaint** – For the purpose of this Pandemic Continuity Operations Plan, a “Complaint” shall mean a report of alleged or believed violation of any state law, regulation, rule or guidance related to occupational health and safety involving a communicable disease, including but not limited to the novel coronavirus COVID-19.
2. **Plan Review** – Employee representatives from each collective bargaining agreement shall have the opportunity to review this plan and have the opportunity to make recommendations. The Town of Starkey agrees that no retaliatory and/or discriminatory action will be made against any employee for making suggestions or recommendations regarding the content of this plan.
3. **Procedure** –
 - A. An employee may present a complaint to the employee’s Supervising Authority. The complaint must be submitted, in writing.
 - B. In the event the informal complaint is not resolved after notifying the Supervising Authority, the employee may submit the matter to the employee’s Department Head, unless the complaint is with the Department Head. The complaint must be submitted, in writing.

- C. In the event the employee is not satisfied with the response from the Department Head or the complaint is with a Department Head, the employee may submit the matter to the Town of Starkey Supervisor. The complaint must be submitted, in writing.
4. **Time Limits –**
- A. To adequately address, especially where the safety of others may be concerned, timely reporting is crucial. A complaint shall be filed within three (3) working days from the date the complainant first became aware of the issue.
 - B. A complainant should allow a minimum of seven (7) working days from the time he/she submitted his/her notification in writing before expecting a response.