CPC COVID Prevention Plan
for All Facilities/Divisions/Programs/Services/Sites/Residences/Affiliates

Iteration as of February 22, 2021

Promulgated by the CPC Law Department, General Counsel, Alan Jay Gerson; Paralegal, Rimma Cohen; Legal Assistant, Scot Sherman; the CPC COVID Prevention Commander Edgar Pereira; the CPC Deputy COVID Prevention Commander, Bill Yeung; and the CPC President and CEO, Wayne Ho.

PRELIMINARY MATTERS AND PROCESS; CLOSURE AND REOPENING

CPC's General Counsel has prepared this document with outstanding input from CPC's "COVID Cabinet", starting with our President & CEO, Wayne Ho, including Alice Wong, Chief-of Staff, Edgar Pereira, Chief Program Officer, John Sullivan, HAP Chief Operating Officer, Bill Yeung, Director of Administrative Affairs, Jonathan Brake, Chief Financial Officer, Steve Yip, Director of Operations, Rimma Cohen, Paralegal, and Scot Sherman, Legal Assistant; and from outside counsel, Kenneth Kirschner and Zachary Siegel of Hogan Lovells US LLP, Andrew Lee, Barbara Hoey, and Nicholas Kromka of Kelley Drye & Warren LLP, and Fernando Koatz of Gleason & Koatz, LLP; with expert medical input by CPC's medical consultants, Dr. Marc Wilkenfeld, Chief of Occupational Medicine, NYU Langone Winthrop Medical Center, and Dr. Andrew Moawad, Resident Physician, as well as CPC's Industrial Hygiene Consultants, Robert Harrington and Antonio DeMartino of the TRC Companies, Inc.

Wayne Ho, CPC President & CEO, Alan Jay Gerson, General Counsel, and Edgar Pereira, COVID Prevention Commander have approved this Master Plan.

This Plan is presented in outline form for ease of reference and use. Referenced Attachments provide additional detail when warranted.

Throughout this Plan "CPC" refers to all of the following: the Chinese-American Planning Council, Inc., the CPC Home Attendant Program, Inc., CPC One LLC, CPC Tenant and Building Services, Inc., The Chinatown Planning Council HDFC, CPC HAP Holdings, Inc., 16 Dutch HDFC, CPC Tribeca Center, Inc., the Nan Shan Local Development Corp., CPC Suffolk HDFC, CPC Norfolk Senior HDFC, CPC Hong Ning LLC, and any new subsidiaries created by CPC or any of the above.

"You" or "Your" refers to any CPC employee, full or part-time, hourly, or salaried, exempt or non-exempt, employee, officer, volunteer, intern, youth worker, senior aide, trainee, home care personnel, consultant, contractor, sub-contractor, or employee or agent thereof, as applicable to any situation or scenario discussed below.

"Community Member(s)" refers to any CPC client, patient, program participant or enrollee, resident, service consumer, or visitor for any purpose.

CPC will remain closed until the NYC seven-day COVID infection rate falls to below 4% During the closure time period, only services, programs and sites providing essential in-person functions according to government mandate will continue to operate on an in-person basis. These include home attendant or other home care services, meals-on-wheels, residential buildings, the IRA house, and early childcare and recreational centers. Administrative offices which support those programs and CPC's central administrative office must function remotely to
the fullest extent possible but may operate with personnel coming to offices only to the extent absolutely necessary to facilitate the essential services and remote activity of all other programs or services. Under no circumstances may staff levels during this time exceed 33% of normal staff levels. Leadership Team members may enter offices as needed provided their presence does not cause personnel levels to exceed 33%.

Until CPC’s official reopening, no CPC personnel may enter CPC premises other than as already allowed, set forth above, except on a case-by-case basis coordinated by a supervisor and the CPC COVID Prevention Commander, Edgar Pereira. No program may conduct any in-person activity, or provide any service, on or off CPC premises, other than providers of essential in-person services referenced above, except as expressly cleared by the COVID Prevention Commander. All programs, facilities, or services operating on an in-person basis during the closure time must strictly follow and adhere to this Plan, as must all programs, facilities, and sites following reopening until further notice.

This Plan is a working ongoing progress. Governmental mandates and guidance along with best medical and industrial hygiene practice change daily as scientific information and understanding about the virus evolves. Accordingly, CPC’s leadership and CPC’s law office will continue to monitor developments and update the Plan as warranted based on legal, governmental, and medical developments, including medical and industrial hygienist consultants’ advice as to best medical and hygiene practice.

We will also update this Plan based on your ongoing candid feedback and input from your experiences, observations, and information. A plan is only as good as it becomes implemented. We count on all CPC to provide continuing feedback as to the Plan content and implementation. You are strongly encouraged to provide this directly or anonymously to your supervisor, the COVID Prevention Commander, or the CPC law office. All feedback will be kept confidential except as required by law or medical urgency. At the law office, you may contact the following:

Alan J. Gerson, General Counsel, agerson@cpc-nyc.org, (917) 8360-32872
Rimma Cohen, Paralegal, rcohen@cpc-nyc.org
Scot Sherman, Legal Assistant, ssherman@cpc-nyc.org

This Plan presents action items in excruciating detail for the reason that the best plan for the purposes of achieving maximum COVID protection and prevention as well as regulatory compliance sets forth such detail. This Plan also presents all the details in order to convey the full scope of the task CPC faces. New York State requires the creation of a detailed plan, and the greater the detail the more effective and legally strong the Plan. However, please see Attachment A (1) for an updated, high level executive summary of this Plan, which we reviewed in training sessions (The Rules of COVID Prevention) and see attachment A (2) for information on the COVID vaccine.

An effective and legally solid plan requires a clear line of authority and organization chart. To that end, our President & CEO, Wayne Ho, has appointed Edgar Pereira as “COVID Prevention Commander”, reporting to our President & CEO, and Bill Yeung as Deputy Commander, for the purposes of finalizing, implementing, and enforcing CPC’s COVID Prevention Plan with ongoing legal advice and direction from your General Counsel, Alan J. Gerson, and the CPC law office. See Section 1, below and the referenced attachment for the complete COVID Prevention Command Structure.

CPC has apprised all unions representing CPC employees of this Plan insofar as it impacts their
members and has elicited union feedback. CPC continues to welcome union feedback and input on the Plan implementation and COVID prevention generally. CPC employees and team members should feel free to discuss this Plan, its implementation, and any workplace COVID concerns with their union and union representatives.

Everyone, all CPC personnel and any volunteers or interns, however, whether or not covered by any collective bargaining agreement, remain expected and required to follow, implement, and assure compliance with standards and requirements set forth in this Plan as applicable to themselves, their workspaces, and their pupils, children, youth, seniors, clients, patients or visitors or anyone under their care, oversight, or auspices.

We are all in this together. We have no choice but to entrust our own health, and the health of our colleagues, clients, patients, community members to each other. We must uphold each other's health and well-being by each of us upholding CPC's COVID Prevention Plan. Our Plan's success depends on the continuing integrity and dedication which you have shown time and again. Together we will conquer the COVID!

Asymptomatic COVID spread, in various strains of varying degree of communicability, has mandated the urgency of the various measures. Government in CPC's jurisdiction has dictated that COVID plans presume that anyone, with or without symptoms, whether or not they have recovered from COVID or received the vaccine, can spread COVID. NYC has required that CPC's plan presume that anyone with what the City has come to call COVID SYMPTOM ILLNESS (CSI), in fact has COVID in the absence of a definitive finding to the contrary, as set forth below. NYU defines CSI as one or more of the following: fever in excess of 100.4°, dry cough, shortness of breath (difficulty breathing), sore throat, diarrhea, chills, muscle aches, headaches, new loss of taste, extreme, unusual fatigue. All such symptoms should be inquired about on any screening questionnaire, and receptionists and everyone should be alert to observation of any such symptoms in themselves and others, all as set forth below.

The Plan takes as its starting point CPC's objective to follow and implement the best, most state-of-the-art feasible legal and medical practices for two reasons in chief: (1) To fulfill the moral imperative to best protect personnel, clients, community members, and everyone who has any contact with CPC from contracting COVID-19; and (2) To set an example as the City's and Nation's premier social services organization. Also, best legal practice corresponds to best, most cautious medical practice in this unprecedented and uncertain legal and medical environment.

More specifically, fulfilling the above objectives requires adherence to three broad strategies:

1. Total and complete compliance with Federal, State, and City law and agency regulations and guidelines. Sometimes, actually quite frequently, the government enacts vague, ambiguous, or even self-contradictory law, rules, regulations, and guidelines. For example, State law requires "frequent" or "rigorous" cleaning without defining those terms. In those cases, we have consulted with, and will continue to do so, our medical and industrial hygienist consultants to identify the best, most prudent practices.

2. Adherence to best safety practices following the precautionary principle of erring on the side of caution, even if that exceeds governmental requirements.

3. Documentation. Recording all measures not only preserves a record of compliance but also helps to assure compliance.
This Plan aims to present the "gold standard" of best medical, industrial hygiene, and legal practices. Financial, physical, or programmatic constraints at times shape feasibility. Accordingly, where law and regulation allow, the Plan presents alternatives among which CPC may choose. In several situations this Plan indicates certain standards or practices as "preferred" or subject to implementation "if feasible" or "if possible". In those cases, the Plan signifies best practices beyond government requirements which constitute objectives which CPC will strive to attain. In other cases, many Plan standards exceed government requirements but are included as CPC requirements, not objectives. Much of this plan is directed to CPC COVID Prevention Personnel (CPP) as they bear much of the responsibility for implementation in their COVID Prevention Units (CPUs). (See the command structure below.) This Plan covers all CPC, with specific sections devoted to requirements of particular programs, services, facilities. When not so noted, the Plan applies to all. At the bottom line, this Plan addresses each CPC Team Member, official, employee, intern, volunteer, contractor, contractor, and each CPC client, patient, student or student parent or guardian, resident, service recipient, program participant, community member, and visitor. To reiterate, we each have the responsibility and imperative to uphold each other during this time by upholding the CPC COVID Prevention Plan.

There is no avoiding that any plan which CPC adopts, even if it were limited to strict regulatory compliance, will involve the dedication of significant funds, time, and human resources. In other words, this is a big deal with a lot for each of us to do. In some cases, CPC may need to hire additional staff or engage outside contractors. CPC, through our fiscal offices will develop, adopt, and track a COVID Prevention budget to facilitate the plan, as well as to document for legal purposes that we have devoted adequate resources to COVID Prevention.

There is a lot to consider and do. Meeting legal requirements let alone best practices will require major physical changes to most if not all CPC spaces, significantly heightened maintenance, serious scheduling and programmatic adjustments, and new attention to new concerns. In an effort to provide a useful framework to organize all the efforts CPC must undertake to achieve best practices, this document organizes the Plan of required and best practices under the rubric of the "Seven C's of COVID Reopening". Those seven C's consist of the following:

I. Command and Control
II. Consideration (for Personnel with Special Needs, Requests, or Concerns)
III. Cleaning (and Maintenance)
IV. Clearance (Entrance Screening Procedures)
V. Contact (Avoidance)
VI. Communication (including Signage, Training Material, and Releases), and
VII. Commodities (Supplies)

This plan has also been digested into a NY State provided template. See Attachment B.

I. COMMAND AND CONTROL

Overview: Law requires CPC to create a written plan with the various elements noted in this Plan. Law does not, however, require any particular command and control or organization structure. Organization imperative nonetheless mandates a clear and effective delineated management structure, with clear assignment of responsibilities, for assuring adherence to any COVID prevention plan put on paper. Any outside review of CPC efforts will look to our COVID related organization chart and adherence to it.
1) BASIC STRUCTURE AND PROCESS

- Our CPC President & CEO has, as stated, appointed Edgar Pereira and Bill Yeung as COVID Prevention Commander and Deputy Commander. He has also convened a COVID Cabinet consisting of himself, Edgar Pereira (Chief Program Officer), Bill Yeung (Director of Administrative Affairs), Alice Wong (Chief of Staff), John Sullivan (HAP Chief Operating Officer), Steve Yip (Director of Operations), Jonathan Brake (Chief Financial Officer), Alan Gerson (General Counsel), and Rimma Cohen (Paralegal). This Cabinet will meet regularly and as needed. See Attachment C for an organizational chart of the COVID prevention team.

- The COVID Commander has announced the different COVID Prevention Units (CPUs) across CPC and their respective COVID Prevention Personnel (CPP). Directors must coordinate and work with their CPP for purposes of developing and documenting site-specific implementation of this Plan. (See Attachment D for a list of CPC’s COVID Prevention Units and their corresponding COVID Prevention Personnel.)

- The CPP will oversee and assure ongoing compliance, including adherence to cleaning schedules, maintenance of equipment, adherence to assigned staff hours, and the availability of supplies, within their CPUs.

- Your CPC law office will continue to stay on top of legal developments and new law, regulation, or official guidance. If you receive such information from your agencies, please forward that to Scot Sherman, at ssherman@cpc-nyc.org. You may contact the GC with any questions, concerns or complaints, directly or anonymously agerson@cpc-nyc.org, or (917) 836-3272.

- CPC has retained the NYU Langone Medical Center as our COVID related consultant. Dr. Marc Wilkenfeld, Chief of Occupational Health at NYU Langone Winthrop will serve as our lead physician consultant. Throughout the process, our medical consultant will be available to field questions. If you have any questions or matters on which you would like to consult with him, please let Rimma Cohen know. She will either forward the questions and responses or set up a Zoom consultation. Dr. Wilkenfeld and Resident Physician, Dr. Andrew Moawad, stand ready to make site visits as needed. In the event of an emergency situation, e.g., a possible exposure, you can contact Rimma Cohen, Edgar Pereira or Alan Gerson and we can reach the doctor or his resident at any time by cell phone.

- CPC has also retained the TRC Companies, Inc. as CPC’s Industrial Hygiene Consultants for five basic purposes: (1) To conduct air audits and HVAC inspections at all CPC sites and premises (except for school based sites where DOE personnel have undertaken the equivalent inspections), and recommend any measures needed to meet COVID prevention air standards; (2) To consult with CPC and our medical consultants and answer questions on best industrial hygiene standards; (3) To review our Master COVID Prevention Plan on an ongoing basis; (4) To undertake any specialized IH training or functions, such as N95 mask fitting; and (5) To develop or provide IH training to staff. TRC is a recognized, credentialed national industrial hygiene firm. If you have any IH
questions or would like a direct IH consultation with them, please let Rimma know.

○ Supervisors and in some cases other personnel will serve as CPP for CPUs. CPPs will for each CPU under their oversight (i) identify and communicate COVID Prevention related needs and conditions in their CPUs to their Directors or to the COVID Commander; (ii) communicate Plan Requirements and elicit and receive COVID related feedback and input from all staff; contractors, interns, volunteers, and officers and all team members; (iii) communicate requirements and elicit feedback to and from program participants, patients, clients, residents, students or student families, program participants, and community members, and (iv) in all respects assure Plan compliance in their CPUs including personnel, Community Member, physical space, and schedule compliance.

○ Leadership Team Members will, as stated, coordinate and work with their CPP to obtain ongoing feedback on concerns, ideas, and observations from staff, team members and all the above.

○ COVID Related functions, including cleaning, cannot be done on an ad hoc basis, and must have regularly assigned personnel. Where CPP do not have sufficient able staff to undertake any particular function you must inform the COVID Prevention Commander, so CPC Central can make the appropriate staff arrangements.

○ CPP and their designated deputies will remain front line resources to their units, assuring compliance and adequate supplies and resources to comply with the plan for their COVID Prevention Units. CPP will report to Edgar or Bill (COVID Commander and Deputy Commander).

○ CPP will prepare a summary of requirements and standards for personnel in their respective units, based on the aforementioned attached executive summary and this Plan document, as applies to their CPU. All personnel will be required to review and sign an affirmation that they received, understand, and will comply with the COVID Prevention Plan’s requirements applicable to them before returning to a CPC site. See Attachment E for the Affirmation.

○ All CPC personnel were scheduled for live remote training, conducted by our medical and industrial hygiene consultants. Here is a link to a recording of one of those trainings (Community Center and Admin Training or Central and Admin Training). As part of the above affirmation, all, personnel must indicate that they either attended a live remote training or viewed this recording.

○ A summary of this plan will be available online to the public. The entire plan will be available to CPC personnel at major sites.

○ Throughout the process and the implementation phase, please keep separate track of and invoice/receipt copies for all COVID related work. Submit such information and documentation to the Fiscal Department in addition to all other submissions in accordance with direction from Fiscal.

2) HVAC and air flow conditions
CPC has engaged our TRC industrial hygiene consultants to inspect all CPC sites except NYC school buildings (where the Department of Education has done this) for HVAC and air flow conditions to make recommendations for meeting best COVID prevention standards (MERV 13-14, 0.35 air exchange/hour, other). CPC Central will follow up with your site appropriately. CPC will require existing site contractors to follow the consultant’s recommendations.

The TRC Consultants have now completed air audit inspections of all CPC facilities and have issued their reports. See Attachment F for a copy of the audit reports identified by site. CPP must familiarize themselves with reports and recommendations and assure ongoing implementation and compliance with recommendations for their respective sites.

The reports present both immediate corrective action and longer-term measures. The immediate corrective action, where necessary, involves strategic placement of portable HEPPA filters to supplement existing ventilation. CPC has purchased sufficient quantities of HEPPA filters to meet all recommendations. CPP must procure needed HEPPA filters from the COVID Prevention Commander.

The longer-term recommendations involve filter upgrades, duct cleaning, mechanism repair and the like. CPP must work with Edgar to schedule these steps ASAP.

3) Other CPC wide Capital Pre-Opening work

- Bathrooms, All CPC toilets should now be equipped with hard toilet seat covers, to prevent splash when flushed. All bathrooms should also be equipped with working hot and cold water, hand sanitizers on outside, signage limiting occupancy and reminding users of proper bathroom etiquette, and adjustments to meet other site-specific bathroom needs.

- "Plexiglass", CPC has retained a Plexiglass installer who has now installed plexiglass or the equivalent at appropriate locations based on criteria set forth below.

- Hand sanitizer dispensers, CPC also has access to installers to install permanent hand sanitizer dispensers. This has now been accomplished at locations identified by the COVID Prevention Commander.

- Both plexiglass or the equivalent partitions and hand sanitizer placement must meet fire code requirements. See Attachment G (1) for fire code requirements on partitions and physical barriers and Attachment G (2) for fire code requirements for hand sanitizers.

- If any CPP has any question about the above or feels that the aforesaid work has not properly been completed at their sites, or that you require additional such items, you should immediately inform the COVID Prevention Commander or Law Office.

4) Major IT Project:
○ Electronic Screening Questionnaire: All CPC sites will need to implement health and travel questionnaires for everyone entering the premises. Verbal and written questionnaires present risks. The safest mode would be electronic. CPC's IT department has set up an organization-wide system. CPC personnel and community members could be required to answer questions available in translation from a phone, tablet, or laptop, preferably their own device and preferably before arriving for an appointment, but if not on their own device then on a device available at our entrances and wiped down between uses. The system could flag any problematic answers and transmit names as either approved for entry or not to the security officer or receptionist at each premise.

○ CPC's HR Department, under the direction of Deputy COVID Prevention Commander, Bill Yeung has completed this task. Every CPC employee, volunteer, intern, officer, or other personnel scheduled to work at any CPC premises or program full or part time, for any period of time, should receive a daily electronic questionnaire for days of scheduled work. Everyone should receive it the night before or early morning of scheduled work hours. Upon electronic submission of answers, the person will receive either a notice that the person must not come into work without calling their supervisor or the HR Department, or an electronic pass to come to work. The electronic pass is good only for the ensuing day and only at regular assigned work premises. All sites will have paper copies of the questionnaire at their reception areas, as set forth below, in the event the system is down or if for any reason an employee, volunteer or intern has not received and filled out the electronic questionnaire, as well as for non-employee visitors. See Attachment H for a copy of the questionnaire.

○ IT will come up with an electronic alternative to recording arrival and departure times for those employees who must record times. This can be done in conjunction with the required health questionnaire.

○ This will be promulgated to all staff prior to reopening.

5) CPC One & Hong Ning Construction/Renovation, special notes:

○ CPC, CPC One and Hong Ning will insist on the incorporation of state-of-the-art post pandemic standard ventilation, bathroom, reception desk configuration, including the above referenced requirements, in all new or renovated buildings or refurbished units including CPC’s new headquarters condo, the Senior Building, and the common Areas of Hong Ning as well as in any future developments. CPC’s General Counsel will review all such contracts to assure this inclusion.

○ To the extent the One and Hong Ning Projects proceed during the COVID period, CPC One and the HDFC as landlords bear a legal and moral responsibility of assuring COVID compliance and best practices on the construction and renovation sites. CPC's counsel will assure that this is spelled out in all construction and renovation contracts. This will also be part of the Owners' Representative's Scope of Work reporting in this regard to the COVID Prevention Officer for the worksite.
6) Staff Input:

○ CPC is committed to inviting staff input on concerns and suggested precautions prior and subsequent to reopening. Each CPP should elicit input from personnel in their unit. Where staff has been working all along at essential service sites or programs their input should still now be elicited based on their experiences to date. This includes HAP attendants.

○ Where employees are represented by a union, the union representative will receive all such elicitation communication and be invited to all meetings on COVID conditions and measures. Where a contractor's employee has a regular presence on CPC premises, e.g., a security guard, they should be equally invited to provide input but making it clear in written communication that we recognize they are a non-employee.

7) Client/Patient/Community Member Input:

○ CPP should also elicit input on COVID concerns and CPC Prevention measures from clients, patients, students or student parents or guardians, program participants, residents, and community members. Each CPP should design an approach for doing so on an ongoing basis and present it to Edgar Pereira, both COVID Prevention Commander and Chief Program Officer for his approval.

8) Shared facility or area.

○ CPP must identify elevators, staircases, common areas including entrances, apparatus including ventilation, used by personnel in your unit but controlled by a landlord or other tenant or entity, and give the name and contact information for such landlord or entity or person to the COVID Prevention Commander who will maintain a log of such space and apparatus.

○ For each of the above, each CPP must ask the entity or person who controls the space or elevator or other apparatus for their COVID plan for that space or apparatus. The CPP must review the plan and monitor its ongoing implementation to assure compliance with this CPC Plan. If you encounter lack of cooperation or the failure to measure up to CPP standards by any landlord or entity or person who controls such space, including any governmental agency, please inform the Law Office which will take the necessary action to assure cooperation and compliance.

9) OPEN SPACE

○ Government guidelines encourage all activities to be moved outdoors whenever possible. Accordingly, please identify all park space in proximity to your sites for which you would like a use permit, all nearby school yards for which you would like access, and any little used streets abutting your facility which you would like closed as a play or recreation Street for children, youth, seniors or others, and your desired hours Please provide this information on an ongoing basis to the Law Office, which will seek the necessary permits.
10) SUPPLIES
  ○ Available or adequate PPE and cleaning supplies will be a critical part of the CPC COVID Prevention Plan. State law requires that we maintain an inventory of extra supply, as set forth below, to assure adequacy. CPC has identified central suppliers available to supplement site suppliers upon need. See the list of required supplies below. CPPs are responsible for always maintaining adequate and the extra inventory of ALL COVID related supplies. If you encounter difficulty in doing so, please immediately inform the COVID Prevention Commander.

II. CONSIDERATION (FOR PERSONNEL WITH SPECIAL NEEDS, REQUESTS, OR CONCERNS)

Overview: Pursuant to the general principle for special accommodation, CPC must make good faith reasonable efforts to accommodate persons with validated medical, including mental health anxiety, issues. If accommodation is not feasible, despite good faith efforts, CPC has the legal option of employment termination, with all public unemployment and special COVID benefits available to any such person or offering another position if a suitable one is available. In many situations, CPC as a matter of policy has chosen to provide accommodation when not required. In providing any accommodation as well as in setting work-at-home schedules, CPC will always treat all employees equitably.

1) Testing
  ○ The current law allows but does not require employers to mandate COVID-19 testing of personnel, except in situations, e.g., nursing homes, which do not apply to CPC. The law prevents employers from requiring antibody testing.
  ○ CPC has, based on input from our medical consultant, decided not to mandate testing at this time. CPC reserves it prerogative to mandate testing for all or some categories of employees based on their work duties if the public health situation or government or medical advice so warrants in order to best protect personnel, clients, patients, or community members.
  ○ The City of New York encourages all New Yorkers to obtain frequent COVID-19 tests. In order to support the City's request, CPC will allow all personnel to obtain testing on work time without loss of compensation or leave time, provided that a staff member arranges an appropriate testing time with their supervisor. All CPC insurance should cover the COVID test, and free City-run sites remain available.
  ○ Anyone who tests positive from any COVID 19 test must immediately inform their CPP. Such information will be kept confidential on a need-to-know basis. If you receive word of a positive test result while at work, you must leave premises immediately or as soon as you can without otherwise endangering any client or patient. In such a case, you may use telephonic communication to request your CPP or Supervisor to arrange a car service, understanding that CPC will inform the driver of the circumstances and that you will use a face mask and maintain social distance from the driver.

2) The Flu Shot
CPC requires all personnel to obtain the seasonal flu shot, unless you do not take the flu shot for reasons of allergy or other medical condition, or religious or other belief. See Attachment I for more information regarding the flu shot requirement.

According to our medical consultants, getting the seasonal flu shot is more important than previously as the pandemic continues, even though the seasonal flu shot will not protect you from COVID. It could however protect you from getting the flu or spreading it to fellow CPC team members or clients or patients at a time when it would be more vital than previously to avoid hospitalization for the seasonal flu. Also, flu symptoms could mask COVID 19. Additionally, the flu temporarily weakens one's immune system. So, if you get the flu you might be more vulnerable to COVID and hence to spreading COVID. Accordingly, CPC and subsidiaries will this season require all CPC employees to receive the flu shot, unless you are medically advised not to receive a flu shot for allergy or other medical reasons or you do not take flu shots for religious reasons or reasons of belief. You may arrange for the flu shot on your work time, and submit any copay not covered by your insurance to your supervisor.

3) The COVID Vaccine

CPC STRONGLY urges all personnel to obtain the COVID vaccine as soon as permissible and possible unless you receive medical advice not to. CPC does not at this time require you to obtain the vaccine, however CPC reserves its prerogative to require all or particular categories of personnel to obtain the vaccine. The vaccine protects you from developing COVID in the event you contract the virus. The vaccine could also prevent you from spreading the virus to others. However, vaccine transmission prevention remains uncertain. So, all persons receiving the vaccine must still wear masks, practice social distancing, and observe all other precautions.

CPC conducted a voluntary all staff presentation with questions and answers with our medical consultants specifically about the vaccine. Anyone who has any further questions they would like to ask the doctors or any concerns they would like to discuss with them about the vaccine and its safety may do so. Please contact Rimma Cohen to arrange a phone or ZOOM appointment.

The following categories of CPC employees fall within priority vaccine categories and are presently able to receive vaccines upon availability: Home attendants, COVID resource navigators, anyone who teaches or works at early childcare centers, after school program teachers or counselors, IRA house staff. In addition, CPC takes the position that staff at any CPC residence, wellness coordinators, and staff who deliver meals-on-wheels are also eligible. Please inform the law office if you are in any of those categories and confront difficulty obtaining a vaccine.

4) Requirements to Remain at Home; entitled compensation.

- If you have traveled for more than 24 hours to any place outside of New York State or any state which borders on New York State, you must remain at home for the 10-day quarantine period. However, if you test negative on a COVID test three days before leaving your destination spot and again four days after returning home you may end the quarantine period three days later, seven days rather than ten after your return. CPC does not require you to undergo this extra
testing.

- **COMPENSATION:** CPC will compensate you for this travel quarantine time without loss of leave time only if you traveled for reason of a special life event, bereavement, wedding, graduation, etc. You may work from home for full compensation if your jobs duties allow. If you traveled for recreation you will be required to use leave days or days without pay for the quarantine period.

- **VACCINATION:** Two weeks after you receive a second vaccine, you are released from all post-travel quarantine requirements. You are not released from travel quarantine requirements without the vaccine even if you test positive for COVID anti-bodies.

○ If you receive a positive COVID 19 test result from any COVID test and if asymptomatic you must remain home for the 10-day quarantine period. You do not need another COVID test to return to work, as such a subsequent test is likely to yield a false positive.

- **COMPENSATION:** State law now requires full compensation beyond medical leave time for three such ten-day periods. Each such period includes weekends or holidays. CPC as a matter of policy will provide compensation for additional quarantine if you test positive for a fourth or subsequent time, provided that CPC may require you to undertake work from home in your current position or another position at the same compensation for which CPC deems you qualified for during those additional periods.

- **VACCINATION:** If you test positive before two weeks after your second vaccine, you must still fully follow the above quarantine requirements. No experience and thus no guidance exists for the scenario in which one tests positive after two weeks following a second vaccination. Please report any such instance to your CPP, the COVID Prevention Commander, or the law office and we will confer with our medical consultants.

○ If you develop any of the symptoms listed below, you must remain home for 10 days after the onset of the first symptom AND until you 24 consecutive hours without a fever greater than 100.4 F without using ibuprofen, Tylenol, or any fever suppressant, AND all of your symptoms are improving AND you obtain a physician’s note or email clearing you for work. This note or email is required under all circumstances. The symptoms triggering the above comprise any one of the following: fever greater than 100.4, diarrhea, chills, shortness of breath, dry coughing, unusual fatigue, new loss of taste or smell.

- If you have a symptom which dissipates before the ten days and you believe it was non-COVID related, you may return to work in less than the ten days only with a physician's note clearing you for work.
• COMPENSATION: If you feel up to it, and your job responsibilities and program contract allow, based on your supervisor’s determination, you may work from home with full compensation without drawing down either extra COVID sick leave under state law or regular sick leave time. It remains entirely your decision whether or not under such circumstances to seek to work from home. You are entitled to up to three fully paid ten-day COVID leave periods without drawing down from your regular sick leave under state law subject to the following. The first such ten-day leave period does not require a positive COVID test, only a COVID symptom. The second and third such periods require a COVID positive test to qualify under new state law. CPC will however compensate you for those periods without loss of regular sick leave if your physician provides a note or email advising that for medical reasons you should not receive a COVID test while you are ill. CPC will also fully compensate you for additional time periods of COVID sick leave upon subsequent COVID positive tests or physician notes or emails attesting to COVID symptoms, subject to the following. If in the judgment of HR based upon medical advice, you present no short-term prospect of return to work or work from home, after you utilize extended COVID leave and your regular sick leave, subject to any collective bargaining requirements, CPC may terminate employment allowing you to utilize disability and any other benefits to which you are entitled. You or your representative should consult HR about such benefits.

• VACCINATION: If you develop COVID symptoms before two weeks following your second vaccination, you must follow all the above protocols and requirements. If you develop any of the above COVID symptoms subsequent to two weeks following your second vaccination, you must obtain a physician’s note or email clearing you for work. Even if not COVID, CPC wants you to fully recover from and not spread any other illness, especially on which mimics COVID symptoms.

○ If you are exposed for a total of 10 minutes or more, not necessarily consecutively, over a 24-hour period within six feet to someone who has tested positive to COVID within 10 days of Your exposure, or to someone who has a COVID symptom, you must remain home for 10 days from your last such exposure.

• COMPENSATION: As this is a mandatory State quarantine you are entitled to take days from your three allowable ten-day COVID periods. You may, however, choose to reserve those days by working from home if in your supervisor’s determination your job position and program contract allow. If you experience an exposure situation after using up all of your three-state entitled COVID leave periods, CPC will still fully compensate you for this quarantine time periods. However, CPC may require you to work remotely in your current or another suitable position for the same compensation.

• VACCINATION: You are not subject to this quarantine requirement following to weeks after your second vaccination.
○ If you are otherwise under a mandatory or precautionary order of quarantine or isolation issued by the State, New York City Department of Health, local Board of Health, or other authorized government entity you must remain at home until the order is lifted.

- COMPENSATION: Under State law you are entitled to three fully compensated ten-day leave periods without taking days from your regular sick leave, provided that the second and third day periods followed a COVID positive test. If your mandatory quarantine period extends beyond the three time periods, CPC will continue to fully compensate you without deducting days from your regular sick time subject to the following. CPC may if you are medically cleared require you to work remotely in your current or another suitable position for the same compensation. If in the judgment of HR based upon medical advice, you present no short-term prospect of return to work or work from home, after using up your extended COVID leave and your regular sick leave, subject to any collective bargaining requirements, CPC may terminate employment allowing you to utilize disability and any other benefits to which you are entitled. You or your representatives should consult HR about such benefits.

- VACCINATION: The specific mandatory quarantine order should take into account your vaccination status.

○ If you remain in the same household with someone who tested COVID positive or with any COVID symptom not attributed by a physician to a non-COVID source, you must remain out of CPC premises or in-person work for 10 days subsequent to one of the following as applicable: your relocation away from the household; the household member’s recovery from COVID symptoms under the above criteria; or ten days after an asymptomatic household members positive COVID test.

- COMPENSATION: CPC will fully compensate without taking days from your normal sick time for the above quarantine time period subject to the following. CPC may require you to work remotely in your current position or another suitable position for the same compensation. Please note these is above and beyond the general requirements of exposure quarantine set forth above, which govern in any cases when you are within six feet of someone who tested positive or has COVID symptom whether or not in your household.

- Vaccination: This quarantine requirement does not apply two weeks or more after your second vaccination.

○ Anyone who remains home for any of the above reasons may only return to work with a physician’s note or email transmission. You should provide this to your supervisor or CPP. This is in keeping with normal CPC policy requiring a doctor’s note if anyone is out sick for five or more days.

○ Testing positive for antibodies does not exempt you from quarantine requirements.
- You do not have to remain at home if an asymptomatic person in your household or anyone to whom you were exposed elsewhere traveled to a quarantine location or was exposed to COVID.

- CPC will appropriately update this Plan as relates to vaccination when a one-dose vaccine becomes available.

- The ten-day COVID extended leave periods referenced above include weekends and holidays. In other words, you will under state law be compensated at the same amount you would normally receive over the period for which you draw down from such periods inclusive of any weekends and holidays which fall out during the time periods.

5) Requests to Work from Home Full Time:

Most programs, divisions and subsidiaries will implement staggered schedules upon CPC's reopening, with employees rotating weeks or days between work-from-home and in the office, except when the nature of the program prevents this. (For reasons explained below in the Contact section, a weekly rotation is much preferable and should be followed unless not feasible.) CPC and subsidiaries will allow full time work-at-home upon request by an employee team member under special circumstances in accordance with criteria outlined below.

- CPC cannot require anyone to work from home due to their age or medical condition.

- If you fall within a government classified vulnerable category because you are over the age of 65 or, if at any age, you have one of the medical conditions listed below, the law requires CPC to make good faith efforts to enable you to work from home if you so request. You will need to provide a doctor's note specifying your condition, which CPC will maintain confidentiality on a need-to-know basis. The applicable medical conditions, subject to additional guidance, consist of the following:
  - COPD
  - Heart Disease
  - Cancer
  - Diabetes
  - Morbid Obesity
  - Any condition which your physician states in a medical note places you in a vulnerable category.

- If for medical reasons beyond general discomfort, you cannot comply with any part of this COVID prevention plan, e.g., you cannot wear a mask, CPC will extend the same consideration as if you fall in a vulnerable category.

- You will be required to produce a physician's note as to your condition, which will be maintained confidentially on a need to note basis.

- If you have a COVID related mental health anxiety condition about work in an
office or travel to work, CPC will, pursuant to law make the above good faith effort to accommodate work from home or find an alternate position if feasible or available. This applies only to a bona fide mental health condition not to general fearfulness or reluctance. You should consult your physician if you think you might have such a condition. You will be required to submit a medical note from a licensed mental health practitioner, which CPC will maintain confidentiality on a need-to-know basis.

- If you provide childcare to a child in your custody and your child's school closes due to a COVID outbreak in the school or your child's cohort is placed in quarantine, CPC will, pursuant to law make the good Faith effort to accommodate full time work from home for the duration of that closure or quarantine.

- Under the law, If the nature of your work or government contract specifications preclude work from home, CPC may legally terminate your employment if you choose not to come into your normal worksite irrespective of your age or medical condition. However, CPC has adopted the policy that it will make good faith efforts to find an alternate work-at-home position to offer to you. If CPC cannot find such a position or if you turn down what CPC offers, CPC will have to relieve you of your employment with all available benefits (about which please consult HR).

- CPC is not legally required to make any good faith effort to accommodate work-from-home under any other circumstances. However, CPC has adopted accommodation policies for making good faith efforts to allow full time work-from-home if feasible or find an alternate work-from-home position if available for the following situations:
  - If you live with an elderly person or someone of any age in a vulnerable category.
  - If school buildings close for precautionary reasons, not related to a COVID outbreak in the school, and you provide childcare to a child, grandchild, or child in a loving relationship to you.
  - If Senior Centers and Senior Day Care close and you provide eldercare to a parent, relative, or senior in a loving relationship to you.
  - If you have exhausted your allowable quarantine period and you have encountered another potential COVID exposure event due to no fault of your own.

6) Child Care:

A) To reiterate, if you must provide care for a child who is not sick but at home for a COVID related, e.g., quarantine reason:
  - CPC extends provisions set forth below to cover any child in a loving relationship, with some proof of relationship.
  - The law currently only mandates extra COVID stay-at-home benefits if the child is subject to a COVID quarantine, including if a school closes due to an outbreak in the school or if the school quarantines the child's cohort due to one or more cases in the cohort.
  - The law does NOT extend any right to compensation for reasons of
school building closures to switch to remote learning for precautionary purposes (to prevent an outbreak), however.

- CPC will make good faith efforts to accommodate or find work-from-home at full compensation during any COVID school or school cohort closure periods.
- Federal law which requires up to ten weeks of paid time at 2/3 pay applies only to any CPC subsidiary with less than 500 Employees (CPC itself has more than 500 employees).
- Regular NY Paid Family Leave applies to COVID situations. Consult with the HR Department if you have any questions about Paid Family Leave.

B) If you provide care to a COVID sick child with whom you have a loving relationship, whether or not recognized by the Paid Family Leave Act, CPC will make best good faith efforts to accommodate work from home upon your request. In any event it remains your entitlement to utilize your own leave time for any caregiving purposes.

7) High Spread Event.

- If you are a possible recipient of a high spread event, meaning if someone else, whether or not known to be COVID infected, intentionally or inadvertently, sneezes on, cough on, spits on, or shouts at you from within six feet or if you feel any saliva droplet, or the like, for any period of time, whether or not you were wearing a mask, you should immediately leave the CPC facility to seek medical treatment. If leaving would endanger a patient or client, you should immediately call your supervisor or CPP to arrange for relief ASAP, including HAP attendants or aides. Current medical information indicates the possibility of effective prophylactic treatment in such cases if administered early, which your physician should assess. In such cases, CPC will arrange for a free car service to transport you to a medical office or facility, with no deduction of leave time for this purpose.

- If you develop a chronic sneeze or cough for any reason, including seasonal allergy, you must pursuant to CPC policy, remain at home until it subsides or until you present a doctor’s note stating that your condition presents no risk of heightened spreading of COVID.

- Sneezing or coughing are high spread events and could spread COVID from asymptomatic carriers. You will be fully compensated without loss of leave time and without loss of the 14-day additional sick time. You will be expected to work from home to the extent feasible.

8) Liability.

In the very unlikely event that a visitor to CPC premises, a colleague, a program participant, a building resident, or a client or patient, or anyone else, names any CPC personnel in a lawsuit alleging liability because the plaintiff or their dependent or decedent allegedly contracted COVID on CPC premises or in the course of a CPC program or while under CPC care, CPC will fully defend and indemnify you, provided you did not grossly deviate from the CPC COVID Prevention Plan. CPC will move for your dismissal from the case and take all steps available to facilitate your dismissal at the earliest possible date. CPC will fully defend you for as long as necessary and will
compensate you for any expense or liability. You of course retain the right to consult with
or retain your own lawyer at your own expense.

9) Transportation

CPC cannot feasibly accommodate work-from-home requests for reasons of commute. CPC
cannot require persons to come into the office for greater time periods because they live
closer than others. However, CPC has adopted the following transportation related policies to mitigate travel concerns:

○ CPC will minimize the number of persons required on site at any time within job
  and government contract constraints.

○ CPC will stagger all hours, within job and government contract constraints, to
  enable you to avoid travel at high peak times. Inform your supervisor of your
  commute time preferences.

○ If despite staggering, a bus, subway, train, ferry, or other transportation mode is
  unusually crowded you may choose to wait for another one. You will not be
  penalized for late arrival beyond your staggered time if you inform your
  supervisor.

○ All CPC facilities will accommodate bicycles, roller skates, pogo sticks, etc.

○ Upon your request, CPC will make good faith efforts to transfer you to a facility
  closer to where you live, within constraints of your job or contract requirements,
  or find an alternate position in a closer CPC facility.

○ If there is sufficient demand at your site, CPC will try to arrange group parking
  discounts at nearby parking facilities.

○ All CPC facilities will make available extra face masks, face shields or goggles,
  gloves, wipes, and hand sanitizer for use on transportation to and from your job
  site.

○ CPC will provide a CPC vehicle or a car service, with the above PPE supplies,
  for any job-related travel between CPC sites, client or patient premises, stores for
  CPC purchases, or any other places for legitimate work-related reasons, if
  beyond reasonable walking distance.

10) Care for a Sick relative:

○ NY state provides for 10 days of partially paid leave pursuant to NYPFL benefits
  which comes from your payroll deduction.

○ The same applies in case of a dependent child.

○ Beyond the above legal requirements, CPC will make good faith efforts to adjust
  hours or accommodate work-from-home in such situations upon presentation of
  documentation of such care to a person in a loving relationship.

○ You may choose to apply your own sick leave to care for a sick relative or person
  in a loving relationship.
o Federal law which requires up to two weeks of time at 2/3 pay applies only to any CPC subsidiary with less than 500 Employees (CPC has more)

11) Remote Accommodation of Clients, Program Participants, Patients, Community Members:

o To the extent programmatically feasible and contractually allowable, all CPC programs and services post-reopening should offer remote, online alternatives to traditional in-person service delivery. Please let the Law Office know if you are unsure if a contract allows this or if you encounter difficulty seeking a waiver or permission from your agency.

o Similarly, programs delivering services involving visits to homes (other than attendants or meal deliveries or other services requiring a physical presence) should call clients in advance to see if they would prefer an in-person or remote telephonic or on-line visit.

o All programs to the extent allowable and feasible should avoid walk-in clients. Programs should publicize and make every effort to require advance appointments to receive CPC services. Programs should schedule appointments on a reduced capacity, staggered basis avoiding multiple parties arriving at the same time. Where CPC must see a walk-in community member due to an emergency situation, that person should if realistic be asked to come back at a time when they can be immediately seen and must under any and all circumstances go through the full, normal entrance screening process, set forth below.

12) Leaving CPC Ahead of Schedule - when required:

o If You or any Community Member are the recipient of a high spread event, if someone intentionally or inadvertently sneezes, coughs, or shouts on or at you, you should leave CPC premises as soon as possible to seek prophylactic medical care. CPC will not penalize the loss of time and will provide a car service to a medical facility.

o Anyone, personnel, or Community Member, who develops COVID symptoms should go to an isolated infirmary space within the facility or program space, which every facility must set up, until they can safely leave, or in the case of children, until an adult can pick them up. In a home care situation, the person should go to a part of the home away from others until they receive a physician medical plan of care stating otherwise. Personnel assisting individuals with any COVID symptom, or who tests positive until meeting recovery criteria noted above, must use disposable gowns, N-95 masks, and face shields.

II. CLEANING (AND MAINTENANCE)

Overview: New York State law requires that "rigorous cleaning and disinfection must occur at least after each shift, daily [with] more frequent cleaning and disinfection for high-risk areas used by many individuals (e.g., restrooms)." In addition, equipment must be cleaned "at least as often as employees or contractors change workstations." Additional, rigorous disinfection must be done in all areas after 24 hours upon discovery of the past (within seven days) presence of
an infected person with COVID or CSI in those areas. NYC DOHMH advises disinfection of space and equipment at least twice daily and in between use by different groups. Government has promulgated regulations in such terms as "more frequent" cleaning of "high risk areas" without defining or specifying "more frequent" or "high risk" thus shifting the onus to organizations like CPC to determine sufficient practices. Based on the above, advice from our medical consultants, and other best practice recommendations, CPC requires that private areas be cleaned daily, common areas twice daily, multi-use equipment or furniture cleaned between use by different individuals or groups, and bathrooms, elevators, and other high intensity areas three times or four times daily depending on their "touch" configurations and usage levels with additional cleaning and disinfection as needed throughout the day, immediately upon an event which leaves an area soiled and immediately after 24 hours following the presence of a COVID positive or COVID symptomatic person for more than 10 minutes, not necessarily consecutive, within 24 hours in an area.

Physical changes and protocols should be made to minimize multi-use or multi-touch surfaces. Government guidelines recommend removal of "hard to clean" furniture and carpets where feasible.

See the Commodities section, below, for criteria for disinfectants. All CPC personnel involved with disinfecting beyond their personal equipment and space must sign off that they have been trained in safe cleaning practices and the safe use of disinfectants. See Attachment J (1) for such training guidelines and Attachment J (2) for a disinfectant usage checklist. State law requires using Department of Environmental Conservation (DEC) products identified by the Environmental Protection Agency (EPA) as effective against COVID. See Attachment J (3) for a list of such products for various purposes. CPC arranged for industrial hygienists to provide training to all cleaners. If you are involved in cleaning beyond your personal space (the all staff training covered protocols for personal space cleaning) and did not attend the cleaning training you must view the recording, at the following link (Cleaning and Facilities Training). Cleaners, whether employed by CPC or by a contractor, must sign the attestation see Attachment E. Common area cleaners must receive gloves, face masks, and face shields as set forth below.

All public guidelines highlight the importance of ventilation and express a preference for outdoor air where safely available. Ventilation must achieve MERV 13 – 16 filtration, with 0.35 air exchange inflow.

Cleaning standards, now a two-step process – first, you must clean all surfaces with soap and water. Take steps to remove stains, grime, soiling substances, all of which prevent effective disinfection. Then you must disinfect the same surfaces using approved disinfecting agents, see below. All areas must be cleaned and disinfected in accordance with the schedules identified below. Common area walls must be disinfected, with wipes or spray, 10 feet from floor at least daily. HVAC systems must be cleaned in accordance with our consultant's recommendations.

CPP must assure proper cleaning of their CPUs in accordance with established schedules, below. If you do not have sufficient personnel or access to a cleaning service to accomplish a required cleaning/disinfecting, please inform the COVID Prevention Commander.

1) Opening – Immediately prior to or following the next and any subsequent reopening following another closure, CPP must assure the following in their respective CPUs:

- Total, thorough cleaning and total disinfecting of all common and private space.
- Adequate draws, containers in each office or workstation to avoid leaving items
on open desk.
- Removal of hard to clean furniture, carpets where feasible.
- Removal of stuffed animals or other hard-to-clean play items.

2) Private work area desks, chairs, equipment

- Person using office, workstation wipes down own space before leaving, unless person has allergy or condition preventing use of disinfectant in which case CPP will arrange for a cleaner to do this after person leaves.

- CPP MUST ASSURE ongoing cleaning supply to each employee for their areas:
  - Wipes
  - Gloves
  - Spray Disinfectant
  - Trash bags for can

3) CPP must establish a schedule and identify personnel for daily floor mopping, disinfecting of private workspaces.

4) Common Areas, without high intensity use, floors, staircases, hallways, outside doorknobs, reception areas, entrances, conference rooms, walls up to 10 feet high at least. [Little used staircases can be cleaned once daily.]

5) CPP must identify individuals and establish schedule for the mid shift and end-of-day (or pre-opening) cleaning and disinfecting.

6) Common Equipment, copy machines, printers, fax machines, etc.

- Where feasible, supervisors should arrange for additional such equipment to minimize number of different users. Every user must disinfect (wipe down) such equipment before and after use, using gloves or washing or sanitizing hands following wipe down. CPP must assure availability of wipes, gloves, hand sanitizer in proximity to all such equipment. CPP must assure posting of signs reminding personnel to disinfect before and after each use.

- In addition, common area cleaners must include all common equipment in their areas in their cleaning and disinfecting.

7) Shared surfaces, computers, other daily use items.

As indicated in the "Contact" section below this should be avoided wherever possible. But where impossible, all staff must:

- Disinfect all shared surfaces, items before and after use, including keyboards, screens, pens, pencils, desktops, seats etc. Everyone must wear and dispose of gloves or wash hands or use hand sanitizer after disinfecting items.

- CPP must assure that persons using such shared items have additional supplies, wipes, gloves, hand sanitizer for this function.
8) Bathrooms

- Replace with touch free toilets, sinks, towel dispensers, where feasible. All newly created common bathrooms, including as part of the CPC One and Hong Ning projects must incorporate these features.
- All toilets must have hard toilet seat covers. CPP must assure signage reminding people to close cover before flushing.
- Daily assure each bathroom has disinfectant, plunger, mop, gloves (individually wrapped), wipes for special situations.
- Replace condom bowls with individual dispensers.
- Clean and disinfect three or four times daily plus as needed after any soiling event. CPP must identify rapid response personnel in the event of soiling. CPP must pre-identify their plumbing service in the event of loss of hot or cold water or other plumbing exigency.

9) Other High intensity spaces, elevators, Lobbies of residential buildings, wait room areas, heavily used public areas.

- These must be cleaned/disinfected three times daily on all workdays. This includes elevator and other walls heavily touched. CPP must assure schedules for the above in their areas, and also identify rapid response personnel to respond immediately to cases of a soiling event. In addition, CPP must accomplish the following.
- Remove needless obstructions to facilitate cleaning.
- Replace fabric or other hard-to-clean furniture with hard surface, easy to clean furniture.

10) Playground Equipment & Area:

- CPP must assure wipe down or spraying of equipment and mopping/disinfecting of floor area after use be each bubble or cohort of children. Liquid and smell must fully dissipate before use by next group. CPP must identify rapid response personnel in event of a soiling occurrence. In addition:
  - New easy to clean equipment if warranted.
  - Sanitizer dispensers and disinfectant on hand at site.
  - Expanded airflow based on consultant’s advice.

11) Kitchens

All kitchen surfaces and floors must be cleaned and disinfected in accordance with above standards for common spaces: twice daily at least if restricted to kitchen staff; three times daily at least if open to staff or visitors generally. CPP must also identify rapid response personnel in case of a soiling event. In addition, CPP must accomplish the following:

- Remove needless obstructions to facilitate cleaning.
- Use easy to clean items.
- Items kept in enclosed storage when not used.
- Sanitizer and glove supplies in each kitchen.
- PPE: All cooks, servers, preparers must at all time wear masks, gloves, hair covering.
- All surfaces from which individuals pick up food must be disinfectant wiped
between staggered groups in addition to three times daily for all common areas.

12) Classrooms, youth programs

CPP must assure their classrooms are cleaned and disinfected before and after each school day. Where children are able to leave the classroom as a group (e.g., to utilize a playground) the classroom must be mopped cleaned and disinfected during that time. Children must not return to the classroom until any smell and liquid has dissipated or dried. In cases where the same space is utilized by different groups, the classroom must be thoroughly cleaned and disinfected between groups. In addition, CPP must assure the following:

- Needless obstructions permanently removed to facilitate cleaning.
- Fabric or other hard to clean furniture replaced with easy to clean furniture.
- Play items, mats, athletic equipment, art equipment, etc. kept in enclosed storage when not used.
- Individual storage areas, containers, set up for each child for mats, bedding, off premises masks, on premises masks, toys or other items assigned to each child.
- Sanitizer dispensers throughout classroom in keeping with fire department rules (see Attachment G (2))
- Wipe down of floor before naps when kids are close to floor.
- Mat/pillow wipe downs before/after each use.
- Wipe down/clean storage area at least daily.
- Bathrooms cleaned every two hours.
- Rapid Response personnel identified for immediate cleaning for soiled bathrooms or other areas.
- Clean, wipe or spray all shared items, athletic equipment, to extent still used between each class or group, and before and after each use.
- Clean/disinfect all toys, items with which a child plays, after placed in mouth, touched with hand from mouth, eyes, or nose, or between uses by different classes (avoided other than playground items/equipment), and at end of day in accordance with DOE standards, see Attachment K.

NOTE: ADEQUATE TIME MUST BE LEFT BETWEEN CLEANING/DISINFECTING OF AN ITEM AND USE BY A CHILD TO ALLOW DISSIPATION OF DISINFECTANT IN ACCORDANCE WITH DISINFECTANT INSTRUCTIONS.

13) Potentially Infected Area, where a COVID positive person may have been present.

We need to take additional disinfecting measures upon learning of the presence within seven days of a COVID positive or person with any COVID symptom. Actionable exposure is defined as people present at or within 6 feet of an area for 10 minutes or longer or any period of time in the event of a super spreading event occurring e.g., sneezing or coughing with or without a mask. However, to avoid time or distance measurement mistakes, CPC will follow the best practice of requiring such cleaning and disinfecting even if a COVID positive or CSI person is thought to have been in the area for any time period within the past seven days, in accordance with the following protocols:

- Immediate evacuation of area until disinfected.
- Seal off and wait 24 hours before disinfection.
- Leave windows and doors open until cleaning and disinfecting is complete to extent feasible.
- Pre-identification of extra precautions to take where evacuation is not possible for safety reasons only, as in a home attendant household where patients cannot be moved. See Attachment L.
- Identification in advance of rapid response trained person(s) to effectuate cleaning.

14) Electrostatic Spray Cleaning

At least one daily cleaning of all spaces other than personal, not shared workspaces, must involve cleaning utilizing an electrostatic sprayer. Usually this would occur at the end of a shift. CPC has purchased a sufficient quantity of handheld electrostatic sprayers for this purpose. If your site has not received the necessary sprayers, please inform the COVID Prevention Commander.

- Proper use of the electrostatic sprayer was covered in the training for cleaners and available in the recording of that training at this link (Cleaning and Facilities Training). You may obtain additional guidance for your particular space for use of electrostatic sprayers from our industrial hygienist consultants or address any questions with them. To schedule an appointment with a hygienist please contact Rimma Cohen. CPP must identify personnel who will utilize the electrostatic sprayers.

15) Ventilation

CPC has retained the TRC firm, see introduction above, to conduct air quality audits of all sites and ongoing follow up as needed. Except sites located in public schools where the Department of Education has undertaken the same. TRC has presented its analysis of HVAC system efficacy, whether or not the HVAC is under CPC direct control, and other factors such as windows and allowable open doors which affect air circulation and quality in every CPC space, including bathrooms for each CPC site. TRC in its site-specific reports has advised us on any necessary steps, both immediate and near term, including filter changes and use of ancillary equipment such as portable HEPPA filters in the interim, needed to meet best COVID prevention air quality and circulation guidelines, consisting of air filtration at MERV 13 or greater and achieving an air flow exchange rate in each room of 0.35 exchanges per hour. See Attachment M (1) for technical results of the TRC analysis and Attachment M (2) for the TRC punch list of steps to take to achieve the aforesaid standards in the identified spaces. These attachments will be electronically updated by Rimma Cohen as we receive additional reports.

- When centers require repair to which cannot be immediately accomplished, CPC will provide HEPA filters as recommended by TRC to compensate any current condition in the HVAC or ventilation systems.

- TRC recommendations take into account air quality when doors must be closed for safety purposes, e.g., preventing young children from wandering off. However, sites must where feasible implement gate or other alternatives to allow sites or centers to maximize air quality assurance.

- All rooms or discrete spaces must install carbon Dioxide meters (they provide an
indirect gauge of inadequate air flow in addition to other safety benefits).

- HEPA units must be available in all isolation or sick rooms.
- CPP must assure necessary changes in windows and installation of window guards, to extent feasible and safe as well as any necessary adjustments to maximize open windows. Please consult with the COVID Prevention Commander on your window plans.
- CPP must assure implementation of all TRC ventilation recommendations for their spaces. FPP must assure a daily check of ventilation systems in their spaces to verify proper functioning.

16) Hot Water, Adequate Water force

CPP must assure hot and cold-water availability in all bathrooms and kitchens. CPP must pre-identify the plumbing service to call for an immediate response in the event of a plumbing emergency. Please contact the COVID Prevention Commander if you need this information. No site may remain open without hot and cold-water availability.

17) Other Cleaning Equipment and Protocols

- All garbage cans, including in bathrooms, should be pedal operated, with bags and covers.
- CPP must assure garbage pickups scheduled so as to avoid overflow.
- Remove any Carpets where feasible and safe to facilitate cleaning.
- If carpets cannot be removed vacuum carpet daily with a HEPA filtered vacuum cleaner – inform the COVID Prevention Commander if you need one.
- When carpets appear soiled, clean with carpet disinfectant.
- Sick space: Every CPC site must create a space where someone who develops COVID indicative symptoms can go and stay temporarily until they are able to leave. See below. For cleaning purposes, those spaces constitute common spaces beforehand (twice daily) and contaminated spaces after such a person leaves (immediately).

18) Cleaning Protocols, CPP must assure the following:

- Mops
  - Use mops with disposable mop heads.
  - Mops must be thoroughly disinfected after mopping each discrete room or area. Normally, mop heads must be disposed of and changed at least every two weeks.
  - In addition, mop heads must be changed and placed in sealed plastic bags or containers after use on an area suspected of COVID contamination or soiled with a bodily substance.
  - Mop handles must be disinfected after the end of each round and between each user.
  - Each CPU must have its own mops, and mops must not be shared among CPUs.
  - All mop heads and other cleaning items must be disposed of in sealed
heavy duty plastic bags.

○ CPP must assure all cleaners, including persons picking up garbage, receive and use adequate protection:
  ● Masks
  ● Gloves
  ● Hand Washing after each discrete area.
  ● Visor protection in situations, such as toilet cleaning, where the cleaner might encounter a splash event.

19) Documentation:

All CPP must create a Daily Cleaning log incorporating a schedule and personnel for all above cleaning applicable to the space or program. Please provide a copy to the COVID Prevention Commander. CPP must implement a system to assure daily cleaning is accomplished, including by trained substitutes in the event that regular cleaning personnel are not available.

IV. CLEARANCE (ENTRANCE SCREENING PROCEDURES)

Overview: CPC requires the screening of everyone who enters premises, beyond the front door reception or security desk, employees, organization, building or elected officials, clients, patients, students, family members, contractors, visitors, through a questionnaire coupled with normal visual observation for signs of COVID symptoms. CPC also requires temperature checks at all premises and programs. Each tenant in a commercial rental building is responsible for its own screening unless a specific arrangement and agreement has been made and reached for the landlord to conduct screening. This includes CPC tenants and CPC where we are the tenant. CPC instructs all reception or security personnel to take measures to prevent anyone known to be COVID positive or who exhibits COVID symptoms (CSI), or who has not received or lacks questionnaire clearance from entering or remaining on premises. CPP for CPUs which encompass entrance areas must assure that PPE and hand sanitizing or washing is available to all who enter any CPC site. CPC must make it clear to employees that their honesty and cooperation is essential to a safe workplace for everyone, including keeping their supervisor or HR informed of any condition which precludes their presence on CPC premises, including COVID positive testing, possible exposure, and travel. The failure to do so could result in loss of employment. Neither negative COVID testing results nor positive antibody test results exempt anyone from the screening procedures outlined above and below.

1) Stay-At- Home requirements for non-CPC employees.

All CPP must communicate to all program participants, clients, patients, community members, contractors, or any other visitors irrespective of age, that they must not enter premises, under ANY circumstances, no matter how important a meeting or appointment may be (CPC will find a way to make it up) if they meet stay-at home criteria set forth above and under the following circumstances:

○ If they have had any of the following symptoms, until they provide a doctor’s note clearing them for work or normal activity, fever (above 100.4 F), coughing, sneezing, diarrhea, chills, extreme fatigue, loss of taste or smell.

○ 10 days after exposure for 10 minutes, not necessarily consecutively, or more
within six feet to someone who has COVID symptoms or has tested positive for COVID.

- 10 days following travel outside of New York State or a state bordering on New York.
- Living with a person with COVID or COVID symptoms for 10 days after that person recovers and is cleared for normal activity under above standards.
- Many programs will create "bubbles" of children, youth, seniors, or other program participants who remain together in their programs. If a person in the same "bubble" gets sick with COVID or COVID symptoms the entire bubble must remain home for 10 days, as if someone in their household had COVID. If two or more from different bubbles contract COVID or CSI, the entire facility must close or go remote for 10 days as set forth above.
- If someone has tested positive for COVID or come down with any of the listed COVID symptoms as defined above, they must not enter CPC premises until recovery from defined as the earlier of 10 days after a test date for a test yielding a positive result or 10 days following the onset of the first COVID symptom, PLUS 24 consecutive hours without fever, PLUS significant symptom improvement in each symptom.
- In addition to all the above, no one who has tested positive for COVID or who has come down with any COVID symptoms may enter ANY CPC premises or program (no matter where the program is conducted) without a doctor’s note clearing them for return. The doctor’s note is required prior to the return of any child, youth, adult, senior, or any program participant before they may return to their program, even if a symptom dissipates quickly.

2) Entrance Protocols

- Physical requirements:
  - All entrances must be equipped with hand sanitizers.
  - All entrances must have individually wrapped masks available, both disposable three-ply surgical masks and cloth masks.
  - All entrances must have a six-foot floor mark or line indicating six feet from receptionist.
  - Equip reception or security desks with plexiglass barriers between security or reception personnel and persons entering premises.
  - Writing desk or stand six feet or more from reception or security desk for any required writing, e.g., filling out entrance questionnaire.

3) Entrance Areas:

- Every entrance area must have a receptionist or security person on duty at all times when the premise is open.
- Back up personnel, must take their place whenever the main receptionist or security person must leave their post. The receptionist or security person must assure the following:
● Receptionist must instruct anyone not wearing a mask over their nose and mouth to put one on before anything else.
● Everyone entering must wash with hand sanitizer or go to bathroom for soap and water before proceeding.
● Avoid congestion, if too many arrive at one time some should be directed to wait outside or come back later.
● If entrance congestion is a regular concern, a site must establish a "club or supermarket line" outside with markers indicating six feet distance for persons in line.
● During congested hours, extra personnel assigned to control flow.

4) Entrance Screening

○ As described above, CPC has implemented an electronic questionnaire screening process for all staff, interns, volunteers. Receptionists or security personnel must assure that all personnel using this system receive the entrance clearance signal after producing their electronic pass before proceeding. Programs may work with IT to set up similar electronic screening for regular program participants. Anyone not using the electronic system for any reason must upon arrival fill out a written questionnaire. Programs or sites may work with IT to establish electronic entrance questionnaires. But in the absence of an electronic system, any person seeking entrance must fill out a paper questionnaire. CPP must assure the availability of paper questionnaires, following the same template as the electronic questionnaire for employees.

○ CPPs for areas including entrances must assure a desk or stand for filling out questionnaires six feet or more away from the reception or security desk. Receptionists or security personnel must assure that commonly used pens or apparatus including the desk or stand, are wiped disinfected between each use. Written questionnaires must be filed in closed draws and receptionist or security personnel must hand sanitize or wash hands after handling each paper.

○ Temperature Checks

● CPC has established contactless stand-alone automatic temperature checks at most entrance ways. Stand alone devices must be six feet or more away from security or reception desks. Reception or security personnel must assure that all persons seeking to enter utilize and receive a clearance signal from those temperature checks before proceeding. If the temperature check yields an abnormally low reading the receptionist or security personnel must make sure the person waits and tries again. No one may enter until they receive a normal reading within range.

● If a person normally runs a high or low fever, that person must produce a doctor's note to that effect. After producing such a note, their CPP must make a computerized note available to the reception or security personnel as to the person's special allowable range.
• In the absence of stand-alone temperature checks, reception or security must use handheld contactless temperature check devices. In utilizing those devices, the reception or security personnel must wear an N95 mask properly fitted and a face visor.

• All programs off CPC premises must take temperature checks in accordance with above protocols as program participants arrive. In early childcare and after school programs, only staff assigned to particular cohorts should take temperatures of participants in their respective cohorts.

• Like all other shared items, handheld temperature devices must be wiped disinfected between use by different temperature checkers.
  
  o CPP for entrance ways must assure compliance with all the above, including the availability of handheld temperature check devices as back up in case stand-alone devices do not work. Speak with the COVID Prevention Commander if you need more devices.

  o CPP should provide their receptionists or security personnel with list of visually identifiable possible COVID symptoms, e.g., constant coughing or gasping for breath. See Attachment N.

5) Rapid Response for situations of person with temperature or COVID symptoms, or problematic questionnaire responses:

  o If a person appears in immediate danger, the receptionist or security must call 911.

  o If no immediate danger, receptionist, or security should suggest that the person come back when they feel better.

  o If a person declines to leave, the receptionist or security should summon a pre-designated person, the CPP or their designee or back-up. That person after quick review of the situation should decide the course. That person must arrive wearing an N-95 mask and face shield.

  o In such a case of a sick person refusing to leave, the receptionist should put on an available N-95 mask, see mask requirements in Contact section, and ask any others in area to wait outside.

  o CPC official will determine one of the following:
    ● Person must leave.
    ● Person has satisfactory explanation so can stay.
    ● Person should be escorted to sick area for further consideration or until someone can come for them, following all sick room protocols.
    ● If a person refuses to follow directions, CPC must call the police to have them removed.

6) Vaccination

CPC does not mandate that visitors or program participants have received either the flu or COVID vaccines. However, all facilities, programs, services, residences, should mount an aggressive campaign strongly encouraging their clients, patients, students or
student families, residents, program participants and community members to obtain both the flu and COVID vaccines. CPP should oversee this and assure that signage of such encouragement is posted throughout their areas.

V. CONTACT AVOIDANCE

Overview: The FIVE basic contact avoidance requirements consist of (1) VERY FREQUENT HANDWASHING, (2) six-foot distancing wherever possible, (3) 33% staff capacity at a maximum with less preferable, (4) mask wearing, and (5) bubbles, bubbles, bubbles - and more bubbles. CPC has adopted the best practice of requiring masks of everyone at all times on CPC Premises or in a CPC Program except when eating or drinking at desks or when alone behind closed doors or for specific exempt activities or situations communicated to you in writing based on medical consultants' advice or when impractical during the administration of first aid or other emergency assistance. Offices or workstations cannot be shared at the same time. No matter how large the space workstations should never directly face each other. All programs and divisions wherever possible should create small cohorts or "bubbles", consisting, preferably of no more than 15 program participants plus staff who stay together throughout the day, day-in and day-out for their entire program participation. Plexiglass must be installed (following fire department guidance, see Attachment G(1) where someone is likely to come within six feet of a CPC case worker, receptionist, security personnel, or other CPC personnel or where staff might work for lack of alternative within six feet of each other.

Facility Quarantine Requirements. CPC will follow the NYC Department of Education protocols in this regard in all facilities. In senior, youth, childcare, or any other program which creates cohort "bubbles" as set forth in this Plan, if any person, staff, or participant, in the bubble contracts COVID, either testing positive or coming down with CSI, the entire bubble, staff and participants, must quarantine for 10 days with in person programming suspended for that period. If two or more people, staff, or participants, from two or more different bubbles or cohorts, come down with COVID or CSI the entire facility must close and quarantine for 10 days. The facility must implement cleaning and disinfecting as set forth in this Plan.

1) STAFF SCHEDULE

- Whenever possible, all work should be done remotely.

- Each program, facility, department, division must stagger staff schedules for in-person and remote work to reduce staff present in a CPC office or facility or at a CPC program at the same time to no more than 33% except for non-administrative homecare personnel, residences, early childcare, functioning after school programs, meals on wheels delivery personnel, or other services where law or contract mandates greater staff levels. CPP must assure compliance with above in their CPUs.

- Alternating weeks is preferable to alternating days for accomplishing staggering to allow for optimal separation and cleaning between different groups.

- On any given workday, facilities, departments, programs, residences should to extent feasible stagger arrival times among the same cohort, both to avoid travel during peak transit times and to avoid all staff arriving together.
○ Stagger lunch and other breaks, where personnel have such schedules, to minimize the number of staff who leave from and return to a site at the same time.

○ CPP must assure compliance with above staff schedule standards and best efforts to meet optimal goals. PLEASE PROVIDE THE COVID PREVENTION COMMANDER WITH STAFF AND TEAM MEMBER SCHEDULES.

2) Masks

CPP must assure that the following requirements are followed:

○ Mask-up! Masks must be worn at all times by all persons on CPC premises, at a CPC program, or at a CPC/HAP household, except when eating at your workspace with no one within six feet of you or when alone behind closed doors. (In addition, exceptions are made for very young children and residents in their households as noted in those sections of this Plan. Also, as noted elsewhere in this Plans, including immediately below, certain individuals must wear N95 masks.)

○ Masks must provide cover from the bridge of the nose to the top of the chin.
  ● Only three-ply masks are acceptable.
  ● Masks must cover your face from the bridge of your nose to the top of your chin.
  ● Staff training covered proper mask handling. The recording of that training is available at this link (Community Center and Admin Training or Central and Admin Training).

○ Everyone must wear masks at ENTRY. CPC reception and security desks must have a supply of individually wrapped masks at all entrances.

○ Masks must be provided in individually wrapped packaging to anyone seeking entry without mask. A supply of individually wrapped masks should be available for this purpose on table or stand six feet from receptionist/security desk.

○ Use masks and keep social distancing during fire drills, but obviously no social distancing required in the event of a real emergency situation.

○ All CPUs must maintain a supply of individually wrapped mask for distribution in case individual masks become soiled.

○ N95 masks:
  ● N95 masks must be given only to the following:
    ▪ Personnel who interact with a person who is COVID positive.
    ▪ Personnel who interact with a person who has one or more COVID symptoms.
    ▪ Personnel who must work within six feet of each other for prolonged time periods, e.g., kitchen staff.
    ▪ Persons who deal with the sick room or assist sick people.
    ▪ Resource navigators
- Cleaning personnel who deal with potential splash situations, e.g., toilet cleaners.
- Home care personnel who might come in contact with bodily fluids or substances.
- Teachers or assistants who assist with toileting.
  - Persons receiving N95s must be fitted by a trained person, CPC will provide. Contact the COVID Prevention Commander to arrange fittings.

- Mask wearing policy for offices or workstations.

- Masks must be worn at all times, except:
  - When alone behind closed door, with knock sign on outside of door.
  - When eating, seated at office or workstation desk.

- EVERYONE MUST MAINTAIN SIX FEET DISTANCING WITH OTHERS EVEN WHEN WEARING MASKS. NO GROUP PHOTOS WITH LESS DISTANCE.

- Additional, second cloth mask covering over your three-ply surgical masks:

  - CPC strongly advises all personnel to properly wear a cloth mask over your three-ply surgical mask. All personnel who work within six feet of program participants, residents, clients, or patients must wear cloth masks or the equivalent over their three-ply surgical masks in those situations. See below for direction on how to affix masks from our industrial hygiene consultants. The cloth mask you wear on CPC Premises or at CPC programs or while delivering CPC services, including home care, must be different from any mask you wear outside or elsewhere. If you would like a free cloth mask from CPC, please approach your supervisor or COVID Prevention Personnel.

- “The Chinese-American Planning Council, Inc. (CPC; the “Client”) has requested that TRC Environmental Corporation (TRC) conduct a review of recent media attention promoting the wearing of two face coverings in the efforts to help control the spread of COVID-19. TRC recognizes that the United States Centers for Disease Control (CDC) is a leading authority on COVID-19 control guidelines. While CDC has not issued an official statement recommending the use of multiple face coverings, they have issued guidance for users.

**Applicability**

CPC policies specify that all staff members will use either, a 3-ply medical procedure mask (also referred to as surgical masks or disposable face masks), or a tight fitting N95 mask. The mask type is specified based on job duty.

This document addresses the potential use of double masks, and is specific to the use of a 3-ply medical procedure mask. For the purposes of clarity, N95 masks should NOT be modified or used with any other mask type that may interfere with the fit of the N95
mask. Face shields that do not contact the mask and do not interfere with the mask straps may be worn with N95 masks when needed.

**CDC Guidelines**

According to the CDC, improving filtration and improving mask fit, are two ways that can increase the protection offered by a face mask. Improved filtration can be accomplished by increasing the number of material layers used in the mask, while improving the fit refers to how a mask is effectively worn on the users' face. A properly fit mask will sit snugly against the face, and will not have gaps between the mask material and the skin, where droplets from the wearer's nose or mouth may escape, unfiltered.

One technique presented by the CDC to improve the filtration and fit of masks, is the use of double masks. The following guidelines are extrapolated from CDC website ([https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html](https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html)) on how to properly use double masking. For the intent of this correspondence, TRC is neither recommending for or against the use of double masks. If a user elects to use a double mask, then these guidelines should be followed:

- Do not use double masking with a N95 mask;
- Double masking should only be used to help create a better seal around your face when using a disposable mask;
- The disposable surgical mask must be worn UNDERNEATH the second mask;
- The second mask should be a cloth reusable mask;
- Make sure you can breathe easily 

- Personnel currently required to wear a N95 mask, must continue to wear a fitted N95 without a cloth mask over it. Cloth masks over a N95 provide no extra protection and could be dangerous to you. You must wear the N95 if you fall in one of the following categories or situations, as previously advised: you work with or are likely to work with COVID or COVID symptomatic patients, you are a first aid responder or are designated to assist sick persons, you might come in contact with another person's bodily fluids or excrement, or you are a bathroom or other cleaner who might encounter a splash situation.

- CPC will strongly encourage CPC clients, patients, program participants, residents, community members, service recipients, and visitors to wear the cloth masks over the three-ply except when medically contraindicated and except also for the following: early childcare care pupils, residents in their own apartments or homes with only a regular or substitute service provider or co-residents present. CPC will provide such encouragement with signage, requests by receptionists or security, and availability of free, clean cloth masks or the equivalent.
3) All Workplaces, Physical Reconfigurations

CPP must assure appropriate physical reconfigurations and space limitations in your unit.

- All workspaces/desks used at same time must be six feet apart.
- Desks, workplaces used at same time must not face each other even if six feet apart.
- No office sharing at same time, including IT, HR, etc.
- Hand sanitizers strategically and abundantly placed throughout premises/
- Wipe dispensers placed strategically throughout premises.
- Pedal operated trash receptacles are strategically placed.
- Minimize or avoid multiple people using same space even at different times, where possible:
  - Use different keyboards, other equipment.
  - One phone/one person (including receptionists), different shifts, different phones.
  - One seat and desk/one-person, different shifts, different seats, and desks.
  - One computer, keyboard, mouse/one-person, different shifts different computers.
  - Where impossible, assure disinfecting between each use, (both when person leaves and when arrives).
- One file cabinet/one person, with name on cabinet, where not feasible minimize the number of people who use the same cabinet draws and assure wiping/spraying of cabinet handles and other appropriate cabinet surfaces between users.
- One person in elevator, except for persons from same household, or senior or disabled person with aide, or child with parents or guardians plus siblings at a time.
- One person in file room at a time.
- One person at a time in bathrooms.

4) Traffic Flow

CPP must take all possible steps to minimize opportunities for persons to come face-to-face or within six feet of each other while navigating CPC premises or program space.

- Directional Arrows on floors to prevent face to face encounters, where feasible
and in all narrow hallways less than 6 feet.

- Where feasible, people should enter and leave premises through different doors.
- Establish and post new maximum capacity based on six feet distancing in all common, wait, and entrance areas.
- If needed, establish a waiting line on the sidewalk outside, with six-foot distance markers.
- Add personnel to lobby, entrance areas during rush hour times to direct and limit arrivals.
- Keep doors open, especially, where they do not have automatic doors where security allows.
- Establish wait areas off to the side of elevators so those waiting do not come face to face with those leaving.
- Establish line markers and canopies for outside lines for entrance areas/

5) Elevators:

- Mark elevator waiting areas, so people do not bump when folks leave the elevator as people wait to get on.
- Elevator button pushing:
  - Position touch free hand sanitizer by every landing, direct all riders to use it on hands before pressing button and after stepping out of elevator.

6) Lunch Areas

All communal dining areas are closed until further notice. Personnel may eat concurrently in outside, courtyard areas so long as they remain six feet apart and do not directly face each other. Personnel may eat seated at their desks or workstations, so long as no one is stationed within six feet and no one directly faces them (which should be the case in any event). No one else may be present in an office or at a workstation, whether or not wearing a mask, while you are eating.

7) Receptionist security

CPP whose CPUs include reception or security stations must assure the following:

- plexiglass separating the receptionist or security guard and anyone who approaches.
- Adequate number of personnel in area to police arrival flow.
- Six feet distance if more than one receptionist or security personnel needed at a time.
- Separate supplies for each receptionist.
- Floor marker denoting six feet for anyone who approaches.
- Separate table or stand for paperwork by people seeking entry.
- Deposit bins for paperwork, if applicable.
- Immediately accessible sanitizer for receptionist to use before and after handling paper, common items.
- Availability of gloves if receptionist wants to use them in addition to hand washing and must use them if interacting with sick, coughing, or sneezing person.
- Every 90 minutes hand washing relief break.
- List of CSI symptoms at desk.
- N95, fitted, at desk in case of sick person situation described above.
○ Visitors log at desk, at visitors’ side of plexiglass or on alternate table/stand.
○ Standalone thermometer at least six feet form personnel desk.

8) Pantries

CPP whose CPU’S include pantry areas must assure that the following protocols are posted and followed:
○ One person at a time in pantry area.
○ Hand Sanitizing readily available.
○ Gloves readily available, individually wrapped.
○ Disinfectant wipes readily available.
○ Close down all water coolers, water fountains, water bottles allowed only.
○ Cup and other dispensers arranged so one only touches one’s own item.
○ Plasticware must be individually wrapped.
○ Microwave disinfectant clean wiped before and after each use.
○ Disinfectant clean wipe all items, or bags or boxes containing food before placing in refrigerator and after removal.
○ Do not put anything back in refrigerator after removal; once in, once out: under no circumstances may you return any item to the refrigerator after it has been removed.
○ Containers must be washed, and disinfectant wiped before putting them back in the next day.
○ Provide nursing mothers who request it with individual refrigerators.

9) Mail Drop Off,

○ CPP whose CPUs include delivery or mail drop off areas must arrange for Contactless mail drop-off.
○ Signs near mail spots advising everyone to wash hands after picking up and opening mail and not to touch face in between.
○ Bins, six feet from reception/security desks or on visitor’s plexiglass side, in which delivery persons can place all envelopes rather than hand off.
○ Package areas where delivery persons can place packages.

10) Appointments

○ All programs and case workers who do not have a set schedule for program participants must require advance appointments to avoid congestion.

○ In the event of a walk-in, the case worker may decide to see the person based on the urgency of the situation only if the walk-in person appropriately fills out the questionnaire, shows NO COVID signs, passes the temperature check, and the case worker’s schedule allows. If any of those conditions are not met, the receptionist or security personnel must ask the person to leave and schedule an appointment.

○ Waiting Rooms: CPPs whose CPUs includes these areas must assure the following:
  ● Wait chairs six feet apart.
  ● A receptionist or wait room monitor is present at all times.
● The receptionist or wait room monitor wipe cleans or sprays chairs after each person, using gloves.

○ Programs or case workers must, to the extent feasible, arrange for clients or patients to fill out paperwork remotely on device or over the phone before coming to office.

11) Work Travel

Supervisors must adopt and inform their staff of the following:

○ Minimize day trips to different sites not in walking distance, where necessary.
○ Provide car service option for business day necessary trips.
○ Have a regular car service for such purposes, with cleaning protocols agreed on in advance.
○ Instruct staff on how to disinfect car seats with wipes or spray before entering.

12) CONFERENCE ROOM MEETINGS

CPPs whose CPUs include these facilities must assure the following:

○ Avoid if possible, switch to virtual event if participants in same office.
○ Plexiglass down center of table.
○ Three-sided plexiglass at each seat (preferred).
○ Use only large conference rooms.
○ Avoid Direct facing.
○ Mark off seating at six feet intervals.
○ Functioning vent system checked and turned on before start of meeting.

13) Office visits

○ Both client and case worker must wear masks at all times, post signs in visit areas.
○ Spread visit stations, establish schedules so caseworker desks are six feet apart from each other when used.
○ Establish spaces where community members remain six feet from the case worker for visits which allow for that.
○ Plexiglass, between case worker and community member, at any event.
○ Install three-sided plexiglass where feasible.
○ Distribute face visors to case workers for situations where case workers must get unusually close to community members outside of plexiglass partitions, or where case workers are concerned about contact with bodily fluids, including saliva.
○ Provide fitted N95 masks to case workers who anticipate getting within six feet of a client or community member.
○ Set up chairs so client does not directly face case worker.
○ Set up desk space on community member’s side of plexiglass, with separate pen, other needed items.
○ Establish protocols for cleaning pens, other items before and after use by any community member.
○ Develop plan to maximize remote appointments.
14) Face Visors and disposable gowns

Visors protect the eyes. They do not substitute for masks. CPP must provide visors and gowns for use by persons who must come in contact with others with COVID or CSI or might come in contact with splatter from infected substances, including the following:

- Persons who work a sick or isolation room.
- COVID Resource navigators
- First Aid Responders to extent masks do not interfere with first aid.
- Temperature checkers (because they stand close).
- Cleaners, especially bathroom cleaners, who face a splash possibility.
- Attendants whose patients who have COVID or any COVID Symptom.
- When in contact with persons not wearing a mask.
- When there is a possibility you come in contact with any bodily fluid or emissions of another person.
- When cleaning suspected infected areas, bathrooms, or other sensitive areas.
- Receptionists or security personnel at front doors and entrances (people may walk in without a mask on).

15) Senior CENTERS/Senior Building Rec. rooms

KEEP IN MIND, SENIORS RANK AMONG THE MOST VULNERABLE POPULATION GROUPS FOR COVID-19.

- Senior Center Directors, as CPP for their Centers, and CPP for residence community or recreation spaces must assure compliance with all below.

- During CPC closures, all Senior Centers and residence community rooms will remain closed for in-person activity. Exemptions for special events with strict protocols may be issued by the COVID Prevention Commander. You may and should conduct remote check-ins, counseling, following administrative and case worker staff requirements set forth in this plan.

- You may also conduct food or other item pick-ups, subject to the following conditions:
  - Stagger senior arrival time, by small groups or individuals.
  - Set down six feet markers for any lines.
  - Assure proper wearing of masks.
  - Place package(s) on a pick-up table so no one comes within six feet of any person.

- Once the Department for the Aged reopens Senior Centers, if this Plan is in effect, CPP for senior centers must assure the following standards subject to any guidelines or requirements issued by the Department:
  - Limit capacity at any one time from normally allowable to 33%.

- Staggered Bubbles:
  - Create bubbles of seniors who sit together at a single lunch table and stay together for all activities, 15 or less in a bubble.
Alternating groups of bubbles can be accomplished through:
- Split shift(s) in one day, or Daily Alternation, or Weekly Alternation, or Combination of above
- Please forward your staggered alternation plan to the COVID Prevention Commander.

Space Configurations:
- Lunch chairs six feet apart
- Maximize outdoor activity, get permission to close streets during senior hours (your General Counsel can help with this).
- Staggered shifts using alternate seating, with, for example, every other seat marked 1 or 2, etc. respectively so different seniors do not sit on same seats.
- Three-sided plexiglass at each lunch seat (Preferred)

Activities
- Each person gets own newspaper.
- No activity involving deep breathing, including singing, wind instruments, aerobic exercise, etc.
- Avoid/Minimize activity for which six feet distancing cannot be maintained.
- No contact dancing, all dancing six feet apart.
- The following activities are OK: ping pong, crafts with individual non-share material, tai chi, light dancing in place six feet apart, movies, lectures, speeches, arts, and crafts without shared items.
- Cards, Mahjong, board games, common item arts and crafts.
  - Only individuals in same bubble or cohort play together.
- Disinfect common items, before and after each cohort's use.
- Remind seniors to not touch faces when playing.
- Remind seniors to wash hands with sanitizer frequently while playing, with nearby sanitizers, and to wash with soap and water when done.
- Gloves for those who handle cash, and seniors deposit cash in box six feet from observer.
- No haircuts, grooming.
- Social, distancing, six feet, maintained on buses with staggered seating and at grounds for cemetery trips.

Personal Hygiene – CPP must enforce entry requirements and post and make hygiene reminders:
- All entry requirements above apply to senior centers and residence community and recreation spaces including temp checks, questionnaires.
- Must require masks at all times when not eating.
- Hand Washing before and after each activity, meal, bathroom use.
- One person in a bathroom at a time.
- Periodic hand sanitizing during activity or use of gloves.
- Encourage avoidance of face touching.
- Disinfecting of any shared items before and after, including Mahjong tiles, ping pong racquet and ball etc.
- Six feet between social worker and client if possible, with plexiglass at desk at any event.
- Three-sided Plexiglass at Social Worker desks (Preferred).
- Set up infirmary for persons who exhibit COVID symptoms until they can safely leave.

- **Food Service**
  - Disposable individually wrapped meal utensils, OR Utensils placed on plates by server with gloves (no hands in common dispensers).
  - Call seniors to get food in limited groups by bubble.
  - Six-foot floor markers for line
  - Floor directional arrows to avoid two-way movement if possible.
  - Food picked up six feet from kitchen staff.
  - Social distancing within kitchen to extent feasible, use of N95 if not feasible.

16) **RESIDENCES** Building Managers as CPP for their respective buildings must assure the following, including in item 17 below.

- **General Practices**
  - One person in elevator at time (additional aides, live-in family allowed).
  - Social Distancing, six feet, in kitchen if possible.
  - Recreation/community rooms: all senior center restrictions apply – please review above.
  - Temp checks, questionnaire before entry into common recreation, community rooms and common outdoor spaces.
  - Indoor community rooms closed during CPC closure.
  - Outdoor common spaces may remain open during CPC closure, subject to restrictions set forth herein.
  - Six feet social distancing in garden.
  - Masks worn outside of apartments.
  - No lobby lounging.
  - Six-foot marker before reception/security desk.
  - Six feet floor markers for line to security.
  - No spitting, littering, signs, and enforcement.
  - Urge/facilitate residents to pay in advance over phones for deliveries.
  - All visitors/delivery persons who go up to apartments subject to temperature check, questionnaire, and symptom screening, refusing entry to anyone who fails a litmus test (They may leave deliveries at security desk, which security should wipe down using gloves which they then dispose.
  - Use contactless questionnaire, either electronic (preferred) or on table/stand six feet or more from security desk.
  - Provide residents with phone numbers to call to get management quickly so they do not go looking.
  - Inform residents/guardians of any potential COVID exposure.
  - Visitor logs for all non-residents in lobbies with reception or security desks.
  - Plexiglass installed at management desks for management who might receive residents or visitors.
  - Management offices reconfigured in accordance with office desk and workspace requirements set forth in this Plan, above.
17) PROCEDURES FOR ENTERING OCCUPIED APARTMENTS IN A NON-EMERGENCY

- Non-emergency entries should be limited to time sensitive, important purposes for which no workaround is possible or to meet legal inspection requirements. The senior CPC or CPC subsidiary official must be apprised in advance.

- Apartments must be selected in advance.
  - The apartment household must be informed in writing in advance, including the time range of the requested visit.
  - Writing must advise all apt. dwellers present to put on masks before others enter, and offer to provide masks to them, if needed.
  - Writing should state that the household SHOULD decline entry without having to tell us the reason if any resident in the apt. has any disease or medical condition which they feel makes them susceptible to COVID, including uncontrolled diabetes, COPD, kidney disease, serious heart disease, cancer, a transplant, a weakened immune system including from steroid use. In such cases the CPP and appropriate building management personnel will work out alternate arrangements on a case-by-case basis.
  - Writing must apprise residents to turn on in advance a well-functioning air conditioner or open all windows to the extent they feel comfortable. The door could also be kept open especially without an air conditioner.
  - Writing must give residents the option and encouragement of leaving the apt. during visit and of rejecting a visit.

- An adult, competent apartment household member should sign an "entry permission slip" before entry. See Attachment O (1) for Entry Permission Slip template. The slip should contain all the above, in a resident’s primary language. This slip should be placed something can be picked up upon arrival six feet or more distant from anyone.

- Only the minimum number of people absolutely necessary for the job should actually enter. Everyone else should remain at least six feet away from the apartment entrance. People entering the apartment must do the following:
  - Sign or re-sign the basic questionnaire: that they have no reason to believe that they are COVID positive, that they neither live with nor have had any close contact with anyone with COVID symptoms or whom they have reason to believe was COVID positive, and that they have not traveled out of the allowable states and countries during the past 14 days. If they cannot affirm all the above, i.e., if they answer yes to any, or if they decline to answer, they must not enter the apartment. This should be done and given to management with social distancing before entry.
  - They must have on a face mask (non-soiled).
  - They must have undergone a temperature check before building or apartment entry.
  - They must wash hands with sanitizer before entry.
  - They must put gloves on both hands.
  - They must advise residents before they open the door to put on masks.
  - They must wipe down with sanitizing wipes any item, e.g., ruler, which might make contact with any wall, floor, ceiling, window, furniture, or other item in the apartment.
Apartment visit must be kept to the absolute minimum time, with notes postponed if feasible until after leaving apartment, during which basic practices must be observed:

- Someone who speaks the primary language of at least one dweller (who can communicate to others) must be present in or by the apartment for communication purposes.
- A minimum of six feet of distance from any dweller must be maintained at all times. If impossible, dwellers must be encouraged to step out of room or apt.
- Visitors must avoid directly facing dwellers, even at social distance.
- Visitors must avoid touching anything in the apartment unless absolutely necessary. If they must touch, they must offer to wipe down what they touched or provide disinfectant wipes to dwellers to wipe down.
- Avoid using bathrooms.
- These procedures must be presented in writing to visitors with the written advance notice.

Afterwards:

- Advise all dwellers to wash their hands.
- Anyone in the apartment must discard gloves immediately upon leaving apt, and put-on new ones before next apt.
- Anyone who was in the apartment must wash with sanitizer immediately upon exit.

Documentation:

- Someone from management must sign off that all the above was followed. See Attachment O for a Sign Off Template. In the event of any breach, an explanation must be given.

18) AFTER SCHOOL YOUTH/Adult Classes/Project Reach

CPP for each program must assure compliance with the following:

- Constitute each class as its own "bubble" or cohort or create bubbles or cohorts for teams of youth or adults who stay together exclusively throughout program.
- Such cohorts should be no greater than 15, including faculty, unless government agency requires greater participation.
- Stagger arrival times for different classes or cohorts to same entrance to extent feasible.
- Take temperature checks of all program participants upon arrival, even if they come from same school building where program takes place.
- All program participants must fill out daily questionnaires either before entrance into a CPC building or before joining a CPC program in a NON – CPC building. In cases of minors under 16, parents must fill out questionnaires and submit them electronically or give to children to bring in.
● You must deny entry to anyone who does not meet temperature or questionnaire criteria.

● Require proper hand washing upon arrival.

● Require proper handwashing as needed, between discrete activities.

● Mark spots for seated or standing to maintain social distancing.

● No close contact sports (e.g., basketball, wrestling, touch football, etc.)

● No therapeutic hugging.

● All sports and other activities should move outside wherever possible.

● Try to arrange for park permits, street closures, contact the LAW office for assistance.

● Badminton, tennis, ping pong, basketball exercise (e.g., foul shooting contests), socially distant dancing, other non-contact sports or activities OK.

● Disinfect balls, birdies, nets, other common equipment before use each session, and after.

● Disinfect chairs and desks before and after use.

● Assign regular seats, spaces where appropriate.

● Separately store individual, items left in between sessions in draws, boxes.

● Remind students not to touch faces.

● Three-sided plexiglass at desks (Preferred and required if six feet distancing cannot be maintained).

● No bonding exercises without six feet distance.

● No overnight trips.

● Day trips only with masks and staggered seat social distancing when Dept. Of Education allows such trips.

● Use buses which have a cleaning protocols spelled out to meet CPC standards, as approved by GC or the COVID Prevention Commander.
● Wipe/spray seats on all transportation before and after each leg of trip.

19) After School Activities

See Attachment P for Department of Education guidance pertaining to after-school. The following is an extrapolation of those guidelines DOE has imposed permit fees on many programs which previously did not have to pay permit fees. CPC believes that all of our after-school programs still remain exempt from such fees. If anyone seeks any fee payment, for use or cleaning or anything else, please let your supervisor and legal know.

- School custodial staff should provide cleaning of CPC program spaces before and after program use, unless children in a program all come from the same class which used the room immediately before. CPC requires cleaning between use of spaces by different groups or cohorts. Please speak with your custodian to arrange this. Let your supervisor and the CPC Law Office know if your school does not agree to provide such cleaning. If school cleaning does not take place, CPC will need to arrange for cleaning in accordance with CPC cleaning guidelines.

- The above cleaning applies to school playground equipment.

- Custodial personnel should not commence their daily disinfecting until your children leave the school building. If they begin earlier, please let your supervisor and CPC Law Office know.

- You can only admit children to a CPC after-school program who were present in school, in your school building, on the day of your program. If a student was absent for any reason during the school day, the student cannot attend after-school. You cannot admit children from a school other than the one where the program takes place. (For CPC after-school programs outside of school buildings, you may admit children from different schools so long as you keep them, in separate classes and keep the classes apart and if feasible arrange for children from different schools to arrive and depart at different, staggered times.)

- Programs must make best efforts to group children by their school day class, not intermingling students from different classes. Where you find that impossible for logistical or contractual reasons, you must document your best efforts and why you found this impossible in a memo to your Supervisor with a copy to the Director.

- CPC programs must provide any snacks or meals to students on a "grab and go" basis, following DOE guidelines. See Attachment Q.

- DOE will only provide limited after-school transportation on a case-by-basis, mostly for children with special needs. If you encounter difficulty arranging for transportation for qualifying children, let your supervisor and The Law Office know.

- All CPC staff must comply with school entrance protocols upon arrival at a school building.
o All administrative meetings with parents or guardians must be held remotely.

o Children must remain six feet apart for all activity to the fullest extent feasible. If an activity involves mid-to-high levels of exertion, children, and staff, must remain at least 12 feet apart.

o The Department of Education allows for some physical or athletic activity, as set forth below. All students must wash hands before and after such activity, and if feasible during the activity. CPC personnel must disinfect wipe all common equipment, such as a tennis ball, before and after use, and restrict use of such a shared item to the same cohort group. Playground equipment must be cleaned between each usage and at the end of the day in accordance with regular cleaning and disinfecting procedures. For CDC guidance on cleaning and disinfecting your facility see Attachment R (1) and for CDC guidance on cleaning, disinfection, and hand hygiene in schools see Attachment R (2).

o DOE categorizes physical activity in three categories:

  ● Level One is allowed subject to the above restrictions and protocols. DOE specifically cites tennis, running, swimming, STEM, cooking, and more as examples of allowable activities, subject to change – check current rules before beginning such activity.

  ● Level Two consists of activities with intermittent but not ongoing close contact among players or with shared equipment, such as baseball and softball. DOE allow for such activity with heightened precautions but does not spell out those precautions. If you want to conduct an activity which you think falls within Level Two, please make an appointment to consult with CPC’s medical consultant to develop the appropriate precautions.

  ● Level Three consists of close contact activity such as basketball, football, ballroom dancing. DOE prohibits these activities in after school programs.

o Maximize outdoor activity. Try to arrange access to school yards or courtyards or nearby walking distance parks for as much time as possible.

o Schools must provide adequate ventilation in keeping with CPC’s adopted COVID standards. Open windows whenever safely possible. If you suspect that your ventilation may not be up to par, remove your class from the space to the extent you can safely do so and let your supervisor know immediately.

o In some cases, children should not for safety reasons wear masks during allowable physical activity. If you think an activity should not involve mask wearing by participants, arrange for a consultation with CPC’s medical consultant before proceeding.

o In addition to guidance set forth in Attachment P, after school programs must still follow applicable CPC guidelines in the CPC COVID Prevention Plan, including
but not limited to the following:

- Make sure only one child enters a bathroom at a time.
- Arrange for parents or guardians to fill out daily questionnaires submit electronically before the program or give them to their children to bring in.
- Encourage parents to consult with their physician about their children getting the flu shot.
- Follow all CPC and DOE protocols for a COVID positive test result or any COVID symptom in any staff or child, including below.
- If you do not have access to the school’s separation space for sick children, you must designate such a space within your program space. Make sure such space is well ventilated. Make sure all staff assisting sick children have access to fitted N95 masks, gloves, gowns, face visors. Make sure all first aid responders have access to ambu bags and AEDs.

20) Early Childcare Centers

- Center Leaders, as CPP form their respective Centers must assure adherence to standards and requirements listed below:

  - Employees and children over two years of age must wear masks at all times, except when alone behind closed doors, all parents of children in our program must be given a list of guidelines for their child to follow, including mask requirements. This letter must be acknowledged prior to the child's first day of classes. See Attachment S

  - Important: after all disinfecting of child used areas or supplies you must leave adequate time before child contact with the surface or area to allow dissipation of disinfectant smell and substance in accordance with disinfectant instructions.

  - All centers must set up “get better” space for any sick child to remain apart from the rest of the class until a parent comes to pick up the child.

  - Teachers, and all staff must be familiar with CSI symptoms and be on the lookout for them, moving a child with any to the designated get better space ASAP.

  - Each center must designate personnel to assist ill children and to oversee the “get better room.” Such personnel must be fitted with N95 masks, which they must use when assisting any ill child, as well as visors, gloves, and gowns.

  - Hand sanitizer and all cleaning substances must be kept out of reach of children. Make sure kids do not drink any or other cleaning substances.

  - Hand washing by children and staff upon arrival, between all activities, before/after eating, before leaving, after elevator use.

  - Set up schedule of frequent handwashing.
● When going out of premises hold sterilized rope rather than hands.

● Disinfect wipe shared items before and after use.

● Use only easy-to-clean items.

● Watch to make sure kids do not share food.

● Remind kids, appropriately, not to touch faces.

● Maximize outdoor time.

● Distribute to all who might be involved with diapering and follow DOE guidance, in Attachment T.

● Make face visors available to staff assisting children when eating or otherwise not wearing masks.

● Set up lunch spots so children are six or more feet apart, not facing each other. If impossible, you must set up inflammable plexiglass or equivalent between children or use three-sided plexiglass around each child.

● Set up schedule to wipe down barrier before and after eating.

● As part of child intake, ask parents or guardians if child is allergic to any cleaning substance; look for signs of allergic reaction, taking all appropriate immediate measures, and then require a doctor’s note before child returns to class and inform CPC medical consultants. Work with medical consultants to find cleaning alternative if child presents an allergy.

● Minimize class sizes, no more than 15 in accord with DOHMH guidelines.

● Teachers and all adults including parents to remain six feet apart except when otherwise necessary to interact with kids. Parents/Guardians drop off children in front of or just inside entrance with Center personnel waiting outside or inside respective.

● Stagger arrival times to extent feasible so different bubble cohorts arrive and leave during different time periods.

● Stagger arrival times within bubble cohorts to extent feasible.

● One child with adult in elevator OR only children with staff in the same bubble or cohort in the elevator.

● Move all administrative work with parents to remote.
● Set up departure procedure so that parents call or wait at entrance and Center staff escort each child down OR pick-up children from outdoor play street or park.

● Assign additional security personnel at entrances as needed as expanded COVID screening may make it more difficult to watch out for wandering children.

● Maximize outdoor air coming in where safely can, in accordance with TRC classroom ventilation reports.

● Teachers, aides advised to wear long sleeve button down shirt.

● Teachers, aides advised to keep hair above collar.

● Adults and children have clothing changes individually stored in case worn clothing becomes soiled.

● Put down floor mats at premises and all classroom entrance places for children and adults to wipe shoes. Children should not change or remove shoes or sneakers.

● Set schedule for cleaning floor mats at least twice daily.

● Prefer non-contact, more distant (aiming for six feet), activity.

● No singing, cheering.

● Humming at normal voice levels allowed.

● Hand clapping and foot stomping are allowed.

● Food brought to kids individually for meals, snacks.

● Make sure toys, balls, all athletic equipment, playground apparatus are thoroughly cleaned and disinfected between use by each cohort of children.

● Avoid interaction in parks, playground with other children not in cohort, to extent practicable.

○ Screening

● Parents complete health questionnaires electronically before arrival each day OR parents fill out questionnaire upon arrival.

● All children must receive temperature checks and observation for CSI
upon arrival before parents leave. Each class must have its own temperature checker who is part of the faculty for that class.

○ Bubble/Cohort

- Create bubble cohorts for each class, so classes do not interact.
- Teachers, assistants, aides should ONLY work with one particular bubble.

○ Toys

- No toys OR ANYTHING from home, except as medically required.
- Toys at the centers must be made of rubber, plastic, metal, or any material that can be easily cleaned. Remove all stuffed animals, except therapeutic soft toys used only by the one child for whom use is prescribed.
- All other stuffed animals and other cloth toys should be removed and not used during this time period.
- Toys made of cloth like material, or material not easily cleaned may not be used at the centers.
- Except in the case of a special needs child, a stuffed animal as prescribed can be used for that individual and not shared at all. When the toy is not in use it must be stored in a sealed container.

○ Nap time:

- Wipe/ disinfect floors as close to nap as possible while allowing any chemical order and substance to dissipate.
- Wipe down mats, mattresses before and after.
- Kids six feet apart, where impossible you must use a portable clear shower curtain barrier between sleeping children.
- Kids head-to-toe.
- Make sure bedding does not touch other children’s bedding.
- Store children's sleeping and other individual items separately for each child.

○ MASK REQUIREMENTS:

- Under 2, masks not required.
- If a child cannot tolerate a mask, physically or emotionally, the child will be switched to remote unless an acceptable alternate plan can be drawn up with CPC medical consultants.
- Every child over two must wear a mask except when eating or for medical care reasons.
- Upon arrival, each child will remove their outside mask, which will be placed in a clean storage container with the child's name.
- The child will be given an indoor cloth mask stored on CPC premises in a
different container with the child’s name.

- Personnel assisting with mask changing will wear a surgical mask, visor, gloves, and gown during that time.

- Personnel assisting with bodily fluids will wear a surgical mask, visor, gloves, and a gown during that time.

- Outdoor and Indoor mask containers must be cleaned before and after the mask is placed in and removed from the container.

- CPC will maintain a supply of at least two indoor masks and extra disposable children’s masks in case needed.

- CPC will change a child’s mask upon need if the mask becomes dirty.

- At dismissal, the above mask procedure will be reversed.

- Indoor masks will be disinfectant wiped daily after use and cleaned weekly plus as needed. (see Attachment U)

  ○ Bathrooms:

    - One child plus adult at a time.
    - Put down hard seat covers before flushing.
    - Affix covers where needed.
    - Make sure children wash hands thoroughly with soap after each bathroom use.
    - Clean & disinfect any soiled areas immediately, identify rapid response personnel for such cleaning.
    - Thorough cleaning/disinfecting every two hours.

21) IRA House

  ○ Create consistent subgroups of individuals and staff who recreate or engage in therapeutic activity together.

  ○ Follow all applicable guidelines for Senior Centers and Adult Classes above.

  ○ Implement temperature checks, questionnaires for all visitors.

  ○ Daily temperature for all residents.

  ○ Train staff to observe COVID symptoms in residents.

  ○ Set up protocols to clean common use items between different groups of users.

  ○ Set up protocols for hand washing, including before and after shared items.
Assisting ill Residents

- Identify staff who will assist sick residents.
- Fit, equip designated staff with N95 masks, gowns, visors for use when assisting ill residents.
- Implement and make known to all staff a response strategy for individuals who exhibit a COVID symptom or test positive, including Quick Testing.
- Consultation for contact testing
- Separate quarters until better.
- Physician clearance.

- Obtain and submit to Rimma Cohen Legal copies of COVID plans of any off-site program’s residents attend, including transportation providers.
- Assure transportation providers practice social distancing, wipe clean seats between users.
- In the event of any deviations from CPC standards, contact Rimma to set up meeting with medical consultants.
- Develop 24-hour rapid response plan, identifying personnel to clean soiled bathroom or other surfaces.
- Implement protocols for use of common refrigerators, pantry areas, by residents, consistent with guidelines for CPC pantries, above.
- Implement protocols for cleaning shower, bath areas between uses, following bathroom guidelines above.
- Mark six feet distancing between seating at communal tables, make sure no one is directly opposite each other.
- Obtain flame-retardant three-sided plexiglass for use at eating areas where you cannot maintain distancing.
- Reconfigure bedrooms, so sleep head-to-toe with maximum distance in between.
- Establish barriers in by head areas, shower curtain plexiglass or furniture, where six feet distance is impossible.

Education
● Therapist to review plans of care for each resident to determine if any COVID prevention measures could be therapeutically detrimental and if so contact Rimma to arrange for a consultation with our physician consultants.

● Therapist to review signage to determine if need for homemade signs or signage adjustments.

● Schedule individual or group sessions for COVID education.

● Identify individual PPE needs for all residents.

● Install plexiglass in any office or counseling areas (three-sided preferred)

● Shift family meetings to remote, to extent feasible.

● Assure that visitors do not go within six feet of persons they are not visiting.

22) Community Centers, HAP office, Project Reach, other walk-in services
   ○ Plexiglass at all counselor stations (Three sided preferred)
   ○ AVOID chairs, couches where possible (other than those reserved for persons with disabilities), where not possible:
     ● Use easy-to-clean chairs.
     ● Wipe down chairs/ couches after each use, Receptionist, or other responsible person, with gloves.
   ○ Reception chairs, six feet apart.
   ○ All wait room, reception area chairs face same direction, not each other.
   ○ If room fills up, ask overflow to wait outside building until called or to schedule an appointment.
   ○ Advance appointments required and staggered.
   ○ Forms, known paperwork filled out in advance online.

23) Meals on Wheels and other home calls
   ○ Follow protocols for home visits listed above.
   ○ Cleaning of seats, and all inside surfaces on all vehicles before and after each round.
   ○ Wipe down cleaning between deliveries.
○ Gloves and Masks must be used by delivery personnel.

○ WIPE Down of boxes as removed from vehicle or immediately prior to delivery at door.

○ Advise recipient to put on mask before opening door, offer to provide masks to recipients.

○ Maintain six feet distance at all times, to extent feasible. If delivery must be made inside apartment, advise recipient to open window to extent safe, keep outside door open, minimize time inside, and maintain six feet distance.

○ Place delivery on table six feet from recipient if feasible.

24) Home Attendant Program (HAP) Homes

HAP must designate CPP for all personnel who work in patient homes, to assure compliance with standards and requirements listed below.

○ Stay-at-Home – Homecare personnel must under CPC policy remain at home and not report to work for the requisite period of times in the same situations as any other CPC employee, set forth above:
  ● If they contract any one of the symptoms on the COVID symptom list, until they provide a doctor's note.
  ● If they tested positive for COVID, even if asymptomatic.
  ● If they traveled outside of New York State or a bordering state.
  ● If they were exposed for a total of ten minutes or more over a 24-hour period within six feet to someone with COVID symptoms or who was COVID positive, other than a HAP patient for whom they are providing care.
  ● If they reside with someone with COVID or any unexplained COVID symptom:
    ▪ Home Care personnel must know that they must inform HAP about any of the above situations.
    ▪ HAP must inform patients of any of the above situations.
  ● NYS authorizes but does not require agencies to allow asymptomatic attendants to work under exposure circumstances within 10 days of exposure:
    ▪ Only as a last resort if an agency can find no alternative coverage, and
    ▪ With best effort to assign such attendant to low-risk patients, and
    ▪ With precautions and self-monitoring spelled out.
    ▪ Suspension of work in event of symptoms.
● In such cases, HAP must continually document that HAP and the attendant have fulfilled all above conditions.

● CPC will only assign such symptomatic personnel, as an absolute last resort, in case of dire patient need and no other available alternative, with patient knowledge and consent.

● Such care personnel must be fitted for and at all times wear N95 masks. Such personnel must eat separate from the patient in a separate room, of in no such room is available 12 feet from patient.

○ Protective Equipment, used by personnel, assured by HAP:

   ● 3 ply surgical masks, required whenever within 6 feet of patient, advised whenever in apartment.

   ● HAP to provide sufficient PPE. In the event extra PPE is needed, home care personnel, must be instructed to immediately call their case worker or CPP.

   ● N95 masks, gowns, face visors, and gloves used:
   
     ▪ Whenever could come in contact with bodily fluid or emissions.

     ▪ Whenever a patient has COVID symptoms or tested positive, until patient meets post-COVID clearance criteria, spelled out above.

     ▪ When washing utensils from which the patient ate, cleaning bathrooms or other soiled areas, mopping, or with other splash situations.

   ● Home care personnel to be fitted for N95 as needed.

   ● HAP to provide a reusable visor for each personnel as needed.

   ● HAP to provide sufficient gowns, pairs of gloves, for each personnel who assists with toileting or other bodily fluids.

   ● Home care personnel must while at homes have access to Hand Sanitizer and soap bar or canister of liquid soap.

   ● Home care personnel while at homes must have access to disinfectant wipes used for wheelchair handles, walkers, dining tables or counters, common use surfaces, doorknobs, and for wiping/spraying furniture prior to use by care personnel and before leaving. HAP will provide as needed.

   ● HAP care personnel must check to assure that their patients' households contain all cleaning material and supplies as specified in this Plan for
cleaning soiled areas, see below, to which the care personnel have access. If a household lacks any such item, in accord with CPC specifications, the home care personnel should inform CPC which will then make provision.

- **Home care personnel will ensure that proper house cleaning agents meet COVID guidelines.** The home attendant will inform HAP if there is inadequate house cleaning or disinfectant material or items.

- **Care personnel are strongly urged to bring a complete change of clothes in case clothes get soiled.** In the event of soiling without an available change, home care personnel should be instructed to call HAP.

- **In the event of an urgent item not available** home care personnel should be instructed to call HAP in emergency situations.

- **Go outdoors with patient in nice weather as much as safely possible,** considering all movement risks including elevator risks.

- **Cooperate with maintaining ventilation.**

(See Attachment V (1) for a Patient agreement to incorporate above.)

○ **Plans of Care or Separate written Direction to all home care personnel must include the following in relation to COVID:**

- Monitoring all patients for COVID symptoms.
- Hand washing requirements throughout the shift.
- Steps to take upon arrival to assure best possible ventilation.
- Assurance of adequate ventilation in sleep and work areas.
- Anticipated situations when care personnel must use extra protection.
- Need for extra supplies.
- Regular cleaning/disinfecting requirements and protocols.
- How to contact HAP in case care personnel get sick or need to leave early for COVID reasons.

○ **Clearance, prior to reporting to work or to each patient household:**

- Care personnel must take and report their own temperatures.
- Care personnel must answer the standard CPC questionnaire.
- Strategy for accomplishing above with a morning text blast.
  - CPC has established a daily phone/text check procedure on the above. That must be enforced. In event of a system failure or lack of response, administrative personnel must reach out by direct call to non-responding personnel.

○ **General Administration Protocols:**

- Preparedness to replace care personnel mid-shift in case they get sick or...
for other situations set forth in this Plan. Place care personnel as close to homes as feasible.

- Attempt to find CPC remote work for home care personnel in vulnerable categories upon their request.

- CPCHAP will offer full time work opportunities, to the extent feasible, to minimize care personnel working for different agencies.

- Care personnel must inform CPC of any exposure to any COVID positive person or to any person with one or more COVID or CSI symptoms, if they provide care in the course of work elsewhere for anyone with COVID or COVID symptoms. In such cases, HAP must consult with CPC medical consultants.

- Maximize time of care personnel with one patient and minimize the number of different patients to extent feasible.

- All other CPC worksite protocols as set forth in this Plan must be imported to patient homes to extent feasible.

- Signage: An email or text version of all standard CPC COVID signage, see below, applicable to home care situations, e.g., hand washing protocols, should be sent periodically to all care personnel and patients, at least monthly.

  ○ Training & Communication

    - HAP Attendants and aides should receive a written statement of COVID precautions including all the above. HAP should keep a record of all such issuances. See Attachment V (2).

    - HAP should issue periodic reminders to attendants and updates as warranted subject to legal and medical consultant's review, at least monthly.

    - HAP should issue periodic COVID Precaution reminders to patients and updates as needed, subject to legal and medical consultant's review, which could be combined with above communications, at least monthly.

    - Required in-person trainings should incorporate COVID precautions, including all relevant parts of this PLAN.

    - Training sessions MUST be held at reduced capacity of room of no more than 33% of normal capacity, with six feet distance between all personnel and mask wearing.

25) Construction and renovation sites.
As the landlord or property owner CPC or appropriate subsidiaries have a responsibility to enforce construction COVID rules on such sites.

○ Do not enter into any construction/renovation contract without review by the General Counsel. The General Counsel will make sure that all such contracts contain provisions requiring that contractors take responsibility for COVID compliance in accordance with this CPC Plan.

○ Prior to commencement of any work, the CPP for the site must obtain the contractor’s COVID compliance plan, covering all subcontractors. The CPP should share the plan with the General Counsel who must OK it as legally compliant before any work begins.

○ CPC and subsidiaries may insist on measures beyond the letter of the law to achieve equivalence with the CPC plan as applied to a construction or renovation site.

○ All CPC owners’ representatives for such work should have COVID compliance as part of their contractual duties, including familiarization with this COVID Prevention Plan.

○ CPP with any Owners’ representatives must make periodic inspections without advance notice of such sites, recording any breaches and corrective action, including stop work in event of a material breach, in a breach log.

○ CPPs or Owners Representative must immediately inform the General Counsel of any breach.

26) Premises Work

The following language must be incorporated in any contract for construction, repair, renovation, rehabilitation, restoration work on any CPC or subsidiary property, including but not limited to any inside work, outdoor construction, roof top, or facade work.

○ COVID 19 Precautions: Contractor below means any Contractor, Sub-contractor, Sub-subcontractor.

- Contractor recognizes that work on CPC premises will take place during the COVID-19 pandemic. Accordingly, Contractor will abide by all provisions and requirements set forth herein and will assure that any sub or sub-subcontractors abide by all provisions. Contractor will further ensure that all of its and its Subcontractor or Sub-Subcontractor employees, full or part time, agents, officers, and anyone in a reporting relationship to the Contractor, Sub-Contractor, or Sub- Sub - will abide by all provisions of this section.

- Contractor will strictly adhere to all applicable rules and regulations pertaining to COVID 19 promulgated by the Federal Government, the State of New York, or the City of New York including any and all Executive Orders pursuant to a State of Emergency declaration issued by
any Chief Executive thereof and any and all regulations issued by any
agency thereof. Contractor will keep abreast of all such orders,
requirements, and rules.

- Prior to commencing any work, including but not limited to any preliminary
  survey or inspection work, Contractor will provide CPC with its written
  COVID Prevention showing how contractor or subcontractor will comply
  with all applicable governmental regulations and any additional
  precautions as such plan and compliance pertains to any CPC premises
  or worksite, whether indoors or outdoors, whether the main work site for
  contractor's or subcontractor's work or ancillary premises in which
  contractor must enter in order to accomplish work.

- Contractor will also at its own expense adhere to all applicable guidelines
  set forth in the CPC COVID Prevention Plan, which has been made
  available to Contractor, whether or not such guidelines exceed
  governmental requirements. This includes but is not limited to the
  following guidance:

  - One person in indoor elevator limits.
  - Proper mask wearing over nose and mouth at all times while on
    CPC premises, including worksites, except when eating or
    drinking.
  - Reporting to CPC of any individual cases of COVID or exposure to
    COVID Temperature checks before entering CPC property,
    including outdoor construction sites.
  - Availability of hot water and soap or hand sanitizer, including in
    outdoor sites.
  - Applying frequency of bathroom cleaning requirements to any
    portable toilets.
  - Maintaining social distance of six feet from individuals on CPC
    premises not involved in work and from workers or job officials
    except when impossible for safety or work function purposes.
  - Informing management of CPC premises before entering any
    common space or individual apartment and following all protocols
    pertaining to such entering.
  - Affixing on jobs applicable COVID safety reminder signage.
  - To extent feasible, contractors will group employees in consistent
    cohorts for the duration of their work.
  - To the extent available, use and provide state-of-the art portable
    toilets, including self-disinfecting portable toilets. If not available,
Contractors will assure use of disinfectant spray or equivalent after every single use. Contractor will assure a rapid response to clean any soiled area in a portable toilet. Contractor will assure and availability and use of hot water and soap or hand sanitizer after use of a portable toilet.

- Any breach of any provision of this section shall be a material breach of this contract or Agreement.

27) Resource Navigators and First Aide responders

- The COVID Prevention Commander will appoint CPP for navigators; CPP for their respective CPUs will have jurisdiction over designated First Aide responders in their Respective CPUs, to assure the following:
  - All such personnel must receive and be fitted with N95 masks.
  - All such personnel must be given visors, gloves, and gowns.
  - Resource navigators should receive periodic COVID testing, at least weekly.
  - First aide responders must receive COVID testing as soon as possible and then four days following any first aide response (Rimma check with Mark on the four days).
  - The recipient of a first aid response should receive, and report results of a COVID test, which CPC will require as a condition of employment or program participation.

28) If special situations render it impossible or not feasible to maintain contact avoidance standards outlined in this section for any CPU, the CPP for the CPU must so inform the COVID Prevention Commander and the Law Office. The Commander will then devise a special plan for that area.

VI. COMMUNICATION (INCLUDING SIGNAGE AND TRAINING MATERIAL RELEASES)

Overview: New York State Law requires CPC to "train all personnel on new protocols and frequently communicate safety guidelines," and that CPC "establish a communication plan for employees and visitors with a consistent means to provide updated information." State law also requires CPC to keep a log showing who visitors see at CPC premises. Clear communication channels and periodic communication improve health and safety outcomes and promote morale. NY also requires CPC to undertake contact tracing in consultation with DOHMH in exposure situations on premises or in programs.

CPP must prepare and issue the periodic communication to their respective CPU team members, staff, interns, contractors, and volunteers as well as to clients, students, student families, patients, trainees, program participants, and community members. All should be translated into Chinese, Spanish, and other languages where appropriate, or contain a statement in those languages as to where to call or go for translation. All communication on
COVID requirements should be submitted to the law office for advance review.

1) The plan

○ A print copy of the entire CPC plan will be kept at Central and each community center, and available for review by personnel.

○ Personnel at any site may at any time request a copy of this Plan electronically. Do so by contacting Rimma Cohen at the Law Department.

○ Prior to the next reopening, each Director must create an Executive Summary of this Master Plan as pertains to staff, team members, volunteers, interns, contractors of their CPUs. Copies must be submitted to the law department and COVID Prevention Commander prior to circulation.

○ Prior to the next reopening, each Director must create an Executive Summary as pertains to clients, students, student families, patients, program participants, community members of their CPUs. Copies must be submitted to the law department and COVID Prevention Commander prior to circulation.

○ See Attachment W for a copy of basic preventative practices and requirements as pertains across CPC.

2) Return Communication

Prior to the next reopening, Rimma Cohen will circulate the recording of the cleaning and general training provided prior to the last reopening to all staff to refresh recollections upon need.

CPP must ask their staff to sign statement that they viewed the training and that they may ask our medical or industrial hygienist consultants any questions they have. See Attachment J (4)

3) Web Site

○ CPC webmasters shall post the statement of basic preventative rules or links thereto on all CPC web sites. See Attachment W.

○ CPP shall post Executive summary extracts on any sites or pages for their programs or CPUs.

○ The COVID Prevention Commander in conjunction with the Law Department shall issue periodic updates amending this Plan as warranted. Webmasters shall post those updates on the respective web sites or pages.

○ No currently closed or remote program or CPU may return to in-person work without completion of all above training.

○ All new employees, interns, volunteers, contractor employees must complete the aforesaid general training plus cleaning if appropriate before assuming duties.
Such training may be completed by viewing cleaning recording, if needed, at this link (Cleaning and Facilities Training): and the general recording at this link (Community Center and Admin Training or Central and Admin Training).

○ CPP must assure that all staff in their CPUS have signed acknowledgements, see Attachment E.

4) To Communication

○ Concerns and suggestions, the following must be disseminated by CPP to their respective CPU staff:
  ● All Staff must know identity and contact information for their CPP, including home care personnel and contractor employees.
  ● All staff, including attendants and contractor employees, must know that they can without concern of recrimination bring any COVID concern or suggestion to their CPP, Supervisor if different, HR Director, any in house medical officer, or the General Counsel, and CPP must provide all personnel in their CPU with contact information for all of above.
  ● Reminder that union members can and should also communicate with their union representative about any COVID concerns.
  ● Staff must know that they can communicate concerns and suggestions anonymously to any of the above CPC officials.
  ● The General Counsel, Alan Gerson, can be contacted through Rimma Cohen at rcohen@cpc-nyc.org or at (212) 941-0920 x168, or directly at, agerson@cpc-nyc.org or at (917) 836-3272.
  ● In any of the above communication, staff may request, and CPC will provide translator assistance.

5) Required Reports

CPP must communicate the following:

○ All staff and program participants must know that they are required subject to discipline including termination to as soon as possible report the following, including if any of the following comes up after they responded to daily arrival questionnaires. CPP will remind personnel in their CPUs of this duty upon reopening and in the periodic updates.

  ● If they learn of a positive test result for themselves or come down with a COVID symptom.
  ● The above with anyone in their household.
  ● Travel to anywhere outside of New York or bordering states
  ● Knowledge or reasonable belief that someone who tested positive for COVID, or had a COVID symptom, was on CPC premises or in a HAP patient apartment. CPC requests that persons making such reports not discuss this with anyone other than the person to whom they make the report in order to respect privacy.
  ● CPC will keep all personal, COVID related information in strict confidence
shared only on a need-to-know basis.

- All program participants, including HAP patients, must know that CPC or HAP can terminate them or their child from any program if they fail to report any of the above.
- Residents cannot be required but should be encouraged to report any of the above.
- CPP must include the above reporting requirements in periodic reports and updates on COVID protocols and guidelines.

6) Threatening behavior.

CPC and subsidiaries must inform and take action with the Police or Mental Health authorities to remove from any program, premises, or residence, anyone who engages in any hostile, threatening behavior towards anyone related to COVID, such as intentionally spitting at someone, intentionally blowing, coughing, sneezing on someone, intentionally soiling an area. This should be reported to the General Counsel ASAP. An exception is made if such conduct is part of a medical condition for which a CPC employee provides care, in which case CPC or HAP must provide written guidelines as part of the plan of care on how to respond, with appropriate needed extra equipment.

7) Logs and contact tracing.

- All programs, services, classes, trainings, center activities must maintain daily attendance records, including participants and staff.

- Visitor Logs – All sites, residences, and programs must maintain visitor logs (programs must record visitors not part of attendance rolls). See Attachment X (1) for a visitors log template.
  
  - NYS law requires CPC to keep a log of all visitors to a site who visit with any CPC or contractor employee, for any reason. This includes CPC personnel from other sites.
  - Logs must include name, date and time, person(s) visited, visitors preferred contact information.
  - Log information may be captured on an entry questionnaire, preferably electronically.
  - HAP attendants should keep a list of non-household visitors during their shifts.

- Residential buildings should similarly log in any visitors, deliverers.
  
  - TUC/16 Dutch should evaluate strategies and cost for a person in lobby of that building, and discuss with General Counsel, Director of Operations, President & CEO.
  - Gotham/contractor must maintain daily lists of persons on construction/renovation sites.

8) Signage. NYS requires adequate and encourages abundant signage.

- Scope of Signage, identify person responsible for signs at your CPU:
• CPC central will prepare and order various types of signs for all sites.

• All signs will either be trilingual or replicated in English, Chinese, and Spanish, and other languages for sites with personnel or program participants with primary languages other than the above, e.g., Russian for some Brooklyn Youth sites, Korean and Russian at HAP.

• CPP must inform the COVID Prevention Commander of required languages other than English, Chinese, and Spanish.

• In addition, COVID prevention officers may prepare homemade or order their own signs subject to General Counsel and COVID Prevention Commander review. All sites and program areas should include the following signage: CPP for homecare personnel must provide this signage as relevant or content thereof electronically or in flyers to all home care personnel:

  ▪ Hand washing technique reminders.
  ▪ Social distancing
  ▪ Mask Requirements
  ▪ Coughing sneezing best practice
  ▪ Preventing the spread
  ▪ Cover your cough.
  ▪ Meeting guidelines
  ▪ Occupancy limit
  ▪ Other general good practice reminders
  ▪ Room occupancy limits
  ▪ Rest Room etiquette
  ▪ Elevator limits and protocols
  ▪ Pantry Limits and protocols
  ▪ Outside dining protocols
  ▪ Other sensitive place requirements
  ▪ Security desk requirements
  ▪ Entrance requirements, questionnaire, mask, temp checks, etc.
  ▪ Compliance is a team effort.
  ▪ Morale boosting e.g., Together, Conquer the COVID!!!!!
  ▪ Points of contact for reports of breaches, suggestions
  ▪ Reminders of vulnerable conditions for which people should stay home as much as possible.
  ▪ Requirement of staying at Home if a person tested positive for COVID 19 or has CSI.
  ▪ Who to notify of particular sensitive situations at particular locations:
    ○ No soap or hot water in bathroom
    ○ Vent system malfunction
  ▪ Cleaning protocol signage at key cleaning spots
  ▪ Hazardous cleaning substance caution signs
  ▪ Wet floor/slip hazard
  ▪ Reduced Maximum Capacity for CPU
- Reduced Maximum capacity for reception areas.
- Appointment required.
- Floor markers for social distance
- Directional Arrows
- Where no parallel hallways, create two-way lanes, with line down middle and directional arrows.

9) Personalized Signs:

- Some of the above may be combined on one sign.
- CPC Central will make and provide above signs to sites and programs unless the COVID Prevention Commander asks particular CPP to create their own signs for their areas.
- In some of the above, printed signs, blanks will be left for CPPs to fill in.
- In addition to the above, CPPs should create special signs for unique features of their unit, subject to General Counsel and COVID Prevention Commander review.
- CPPs with personnel may choose to make CPU personalized signage, subject to legal review.
- Please indicate if you need CPC central to provide or if intend to create any special child friendly signs.

10) Breaches

- Responses
  - Anyone who observes a breach of any part of this plan, including soiled conditions or equipment malfunctions, persons with COVID symptoms, the discovery that a person with COVID has been in a premise, and including persons not in compliance, e.g., not wearing face masks where they should, must immediately inform their supervisor, CPP, the Commander, Deputy Commander, or General Counsel.

  - Every employee has the right to leave the portion of a premises, and urge others to leave, impacted by the breach unless leaving will endanger a client or patient.

    - In the latter case, the employee may if it can be done safely, escort the patient or client away from the impacted area.
    - A Team Member, employee may take such action without fear of recrimination.

  - If an employee disagrees with a COVID related action or inaction by their supervisor or CPO, or with a finding that an area is safe for work, the employee may appeal to the COVID Prevention Commander or Deputy and then to the General Counsel.

- Breach Logs
  - Each CPP should maintain a breach log to record any reports or observations of derogations from the CPC COVID Prevention Plan and
the corrective action. See Attachment X (2) for breach log template. The log should include the following:

- Date
- Who observed or made the report
- Description of Report or observation
- Finding
- Any corrective action taken.

- Each CPP should maintain a COVID tracing log for incidents of persons with COVID or CSI on premises, including in HAP households, and action taken. See Attachment X (3) for a contact tracing log template. Such a Log should include the following:
  - Date
  - Name of Person with COVID or CSI
  - How it was discovered by CPP that such person was on premises, detailing chain of events
  - Timeline showing where, for how long approximately person was at different locations, and who was exposed to such person (employees, visitors, participants)
  - Circumstances under which person left premises.
  - Cleaning Action taken
  - Contact tracing initiated and concluded.
  - Department of Health and Mental Hygiene (DOHMH) report: time and date, person to whom at DOHMH report made, any DOHMH direction.

- Communication of Breaches: Every CPP should forward a copy of each entry in either above log upon being entered to Rimma Cohen, at rcohen@cpc-nyc.org.

  o Presidential Communication:

  The President & CEO will convene his COVID cabinet at least every other week to review COVID matters in CPC and subsidiaries.

  - The COVID Prevention Commander, Deputy, and General Counsel will keep the President fully informed of material developments or occurrences in real time, as the President & CEO bears ultimate decision-making authority.
  - Any CPC or subsidiary personnel should feel free to email our President and CEO, Wayne Ho, with any COVID concern at who@cpc-nyc.org.
  - The President & CEO will issue periodic communications to personnel, clients, patients, community members as warranted, subject to legal review and advice.
  - The President and CEO will keep the Board Chair and Board informed of all material COVID developments.
  - The President and CEO will ultimately approve any changes or additions in or to the CPC COVID Prevention Plan, subject to legal advice.

11) Releases, assumption of risk, employee information documents
○ Employees: CPC may not require employees to sign a liability waiver. CPC will only require employees to sign a statement that they have read, understand, and agree to comply with requirements of the CPC plan.

○ Program Participants: CPC may require program participants to sign waivers, subject to contrary government agency regulation. The COVID Prevention Commander will decide this in consultation with the President & CEO on a program-by-program basis. See Attachment Y for a waiver template. COVID risk language should be incorporated in HAP patient agreements. Note, these waivers are certainly no substitute for following and implementing best practices including all protocols and requirements set forth in this CPC Master COVID Prevention Plan.

○ Rules & Regulations
  ● A copy of CPC’s Basic Preventative Practices and Rules can be found in Attachment W. All Team members, employees, officers, interns, volunteers, contractors, contractor employees, clients, patients, students or student families or guardians, service recipients, program participants, residents utilizing common rooms or outside spaces, and community members and visitors may be asked to affirm that they agree to abide by these basic rules.

○ Accommodations
  ● CPC will always make best efforts to accommodate anyone interacting with CPC, officials, team members, employees, interns, volunteers, contractors, clients, patients, students, student families, program participants, residents and community members with any special medical, physical, emotional, social, military service, or family needs. If you seek or require special accommodation in relation to any rules or requirements set forth in this Plan, or for any omissions, please inform in writing or verbally by phone the COVID Prevention Commander or the law office (Rimma Cohen, Scot Sherman, or Alan Gerson, General Counsel).

VII. COMMODITIES (SUPPLIES)

OVERVIEW: Law and regulation require CPC to maintain adequate supply of all PPE and cleaning and related items to meet all reasonably anticipated COVID related needs. Regulations also mandate that CPC maintain an over-supply inventory at all times. Accordingly, when ordering for one month, each CPU (see below) should order sufficient supplies to have in hand an extra week’s quantity in all supplies at all times. If an unexpected situation results in less than a one week’s inventory at any time special orders must be immediately placed. As mentioned previously in the cleaning section, State law requires using Department of Environmental Conservation (DEC) products identified by the Environmental Protection Agency (EPA) as effective against COVID. See Attachment J (3) for a list of such products for various purposes. Regular masks must cover the nose and mouth and be three-ply, with individually fitted N95 masks used in special situations set forth above in this Plan.

CPP should coordinate ordering supplies with their directors through their program’s or CPU’s regular supplier. If your regular suppliers cannot on a timely basis provide the required quantity and quality of any supply, please immediately notify Bill Yeung, Deputy COVID Prevention
Commander or Edgar Pereira, COVID Prevention Commander. CPC has identified back-up suppliers to meet all needs.

1) CPC will make all required PPE supplies available to all CPC employees, interns, volunteers, who have the option of obtaining PPE through CPC or on their own. CPP must assure availability of sufficient PPE, including an overage in case of soiling or breakage. Contractors must provide PPE to their employees or otherwise assure employee use of PPE. Generally, program participants, clients, patients, students or student families, residents, visitors, and community members remain responsible for their own PPE, except that CPC will provide school day masks for students at early childcare centers. However, CPC will maintain sufficient supply of and provide masks and other PPE as appropriate to anyone on CPC premises or in a CPC program or receiving any CPC service who require the PPE.

   o In cases of individual supplies, e.g., masks, gloves, gowns, etc., the best practice would be for each CPP to distribute a monthly supply of all such supplies to each team member. If your CPP prefers a different distribution or availability system, the CPP may implement that so long as it assures sufficient and ready availability.

   o Individual supplies should be kept unopened within packages or wrapped until opened by the individual recipient.

   o All team members should know that they should go to their CPPs if they unexpectedly run low of any supply.

2) Distribution: Masks and gloves must be provided individually wrapped or in unopened boxes.

3) Training: The general and cleaning session included training on proper mask use and proper use of other supplies requiring training. Please review those recordings if you need refreshers. The CPP must also read instructions and labels with any PPE or cleaning supplies to assure proper, safe use in their CPUs. CPP must assure that everyone in their CPU knows that if they have any question about the proper, safe use of any PPE or cleaning substance, they should consult the CPP or Deputy or COVID Prevention Commander.

4) Supply Needs: If any CPP has not already done so, please inform Rimma Cohen of your monthly supply needs for each item listed below, and any additional item. CPC needs that information to plan for adequate back-up. If you are not sure of your needed quantity please consult with the COVID Prevention Commander, Edgar Pereira or Deputy Commander, Bill Yeung will figure it out with you.

5) All CPP must assure sufficient supply on-hand based on the standards set forth above for each item applicable to your CPU listed below:

   o Three-ply masks individually wrapped.
   o N95 masks individually fitted.
   o Children's three-ply disposable masks
   o Children's reusable three-ply or equivalent cloth masks
   o Gloves individually wrapped. (small, medium, large, extra large
   o Disinfectant Wipes, 99% bacteria AND virus effectiveness
- Germicidal Clorox, 8.25%; Sodium Hypochlorite or equivalent floor disinfectant
- Hand soap, liquid dispenser full soap
- Hand Sanitizer, with at least 70% alcohol
- Lysol Disinfectant Spray or equivalent, 99% effectiveness with bacteria and virus
- Furniture Cleaner
- Mop Heads
- Toilet Cleaner, 8.25 sodium Hypochlorite or equivalent
- Disposable fitted toilet seat covers (Preferred)
- Air system filters based on consultant's recommendations.
- Electrostatic sprayer cleaning substance, maximum effectiveness recommended by sprayer instructions.
- Disposable Gowns
- Carpet disinfectant cleaner

6) Non-recurring items, please indicate your estimate for an initial quantity of supplies you do not anticipate replenishing regularly.

- Face Visors
- First Aid Ambu bags
- AEDs (Defibrillators)
- Plexiglass partitions, three sided
- Plexiglass partitions, one sided
- Thermometers, handheld
- Thermometers, Standalone automatic
- Mops and Pails
- Replacement of existing with easy to clean new desks, seats, other furniture.
- Hard toilet seat covers.
- Automatic or mechanical bathroom paper towel dispenser (Preferred)
- Rubber, most safe hard toys to replace cloth toys (e.g., stuffed animals), indicating particular toys.
- Electrostatic Sprayer
- HEPA vacuum cleaner
- HEPA filter

VIII. CONTINUATION

All CPP are required and all staff, interns, volunteers, contractors, clients, patients, students or student families, residents, program participants, and community Members are requested to please inform the COVID Prevention Commander or law office, attention of Rimma Cohen, verbally or preferably in writing of any of the following:

1) Any sites or spaces of concern not covered in this Plan.

2) Any activities of concern not covered in this Plan.

3) Any COVID Prevention Strategies not presented in this Plan.

4) Anything else you can think of as guidance CPC should consider.

YOUR ONGOING OBSERVATIONS, QUESTIONS, AND SUGGESTIONS FORM A CRITICAL PART OF CPC’S COVID PREVENTION PLAN AND STRATEGY.
ATTACHMENTS

Please contact Rimma Cohen directly at rcohen@cpc-nyc.org if you would like a copy of any of the attachments mentioned in this Plan.

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