

Public Employer Health Emergency Plan for Town of Cornwall

March 8, 2021

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

Promulgation

This plan has been developed in accordance with the amended New York State Labor Law section 27-c as applicable.

This plan has been developed with the input of Town of Cornwall, CSEA Local 1000, and the Cornwall Police Benevolent Association, Inc (PBA), as required by the amended New York State Labor Law.

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

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

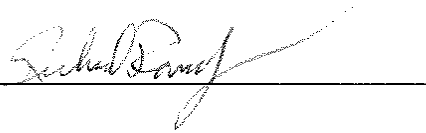
As the authorized official of Town of Cornwall, I hereby attest that this plan has been developed, approved, and placed in full effect in accordance with S8617B/A10832 which amends New York State Labor Law section 27-c as applicable, to address public health emergency planning requirements.

Signed on this day: March 8, 2021

By: Richard Randazzo

Title: Supervisor, Town of Cornwall

Signature: _____

A handwritten signature in black ink, appearing to read "Richard Randazzo", is written over a horizontal line.

Record of Changes

Date of Change	Description of Change	Implemented by

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Purpose, Scope, and Assumptions

Purpose

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

Scope

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

Situation Overview

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

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

1. Using hand sanitizer and washing hands with soap and water frequently, including:
 - a. After using the restroom
 - b. After returning from a public outing
 - c. After touching/disposing of garbage
 - d. After using public computers, touching public tables and countertops, etc.
2. Practice social distancing when possible.
3. If you are feeling ill or have a fever, notify your supervisor immediately and go home.
4. If you start to experience coughing or sneezing, step away from people and food, cough or sneeze into the crook of your arm or a tissue, the latter of which should be disposed of immediately.
5. Clean and disinfect workstations at the beginning, middle, and end of each shift.
6. Other guidance which may be published by the CDC, the State Department of Health, or County health officials.

Planning Assumptions

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

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

1. The health and safety of our employees and contractors, and their families, is of utmost importance.

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

Concept of Operations

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

Upon the determination of implementing this plan, all employees of the Town of Cornwall shall be notified by email from the Supervisor with details provided as possible and necessary, with additional information and updates provided on a regular basis. Department Heads will be notified of pertinent operational changes by way of email. Other interested parties, such as vendors, will be notified by phone and/or email as necessary. The Supervisor will maintain communications with the public and constituents as needed throughout the implementation of this plan.

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

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

Mission Essential Functions

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

Essential functions are those functions that enable an organization to:

1. Maintain the safety of employees, contractors, and our constituency
2. Provide vital services
3. Provide services required by law
4. Sustain quality operations
5. Uphold the core values of the Town of Cornwall

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

Essential functions are prioritized according to:

1. The time criticality of each essential function
2. Interdependency of one function to others
3. The recovery sequence of essential functions and their vital processes

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

The mission essential functions for the Town of Cornwall have been identified as:

Essential Function	Description	Priority
Daily Administration (Town Supervisor)	Management and oversight of daily operations of all Town services	1
Law Enforcement	Maintenance of public order and safety in town	1
Justice Court	Adjudication of misdemeanor criminal matters as well as claimed violations, traffic violations, code violations and small claims matters	3
Sanitation	Collection and disposal of garbage, recyclables, and other refuse in all garbage districts	1
Sewer Services	Ensures safe and effective operation of Town sewer systems	1
Road Maintenance	Maintenance of Town Roads including plowing/sanding to keep them passable.	1
Water Service	Distribution of clean drinking water, meter reading	1
Code Enforcement	Enforcement of Town Codes/Building Permits/Fire Inspections, etc.	2
Financial Management	Provides accounting services and general oversight of revenue collection, bill payment, payroll, budget, and other general fiscal management services	1
Building & Grounds	Maintenance, including cleaning and sanitization of Town owned property. Clearing and plowing all municipal parking lots and driveways	1
Property Assessments	Establishes value of real property in town and provides guidance to Town regarding same; also administer to and provides guidance to town residents on availability of various real property tax exemptions	3
Town Clerk	Provides services associated with Town records, issues various licenses, maintains Town records and handles freedom of information requests	1
Tax Collection	Preparation, mailing, and collection of property tax payments	2

Essential Positions

Each essential function identified above requires certain positions on-site to effectively operate. The table below identifies the positions or titles that are essential to be staffed on-site for the continued operation of each essential function. Note that while some functions and associated personnel may be essential, some of these can be conducted remotely and do not need to be identified in this section.

Essential Function	Essential Positions/Titles	Justification for Each
Daily Administration	Town Supervisor Staff	The Town Supervisor is the Chief Executive for the Town. He oversees the daily operations of all Town departments, which oftentimes requires a physical presence. His staff may be necessary in order to implement policy and directives, but may be able, at times, to work by remote access.
Sanitation	Highway Superintendent Working Leader Driver Laborer	The Highway Superintendent establishes work schedules and priorities for sanitation collection. In addition, organizes staff. Staff members collect and dispose of household trash and recycling.
Buildings & Grounds	Superintendent Groundskeeper	Building and grounds maintenance, repairs, recreational facilities, cleaning, etc.
*Justice Court	Town Justice Clerks Court Officers	In general, the adjudication of criminal and civil matters requires all parties appear in person. Procedures are now in place to conduct some court proceedings via remote access and some administrative functions can be handled off-site, but others cannot.
Town Clerk	Town Clerk Deputy Clerk Clerks	Provides services associated with Town records, issues various licenses, maintains Town records, and handles freedom of information requests.
Road Maintenance	Highway Superintendent Clerk Working Leader MEO MEO/Mechanic Laborer	This work can't be performed remotely but could potentially require less staff depending on the type and amount of work required.
Law Enforcement	Police Chief Police Sergeants Police Officers Clerk Dispatchers	The Police Chief establishes work schedules and oversees department. Police Officers patrol and respond to calls for assistance.

Financial Management	Bookkeeper Payroll clerk	Provides accounting services and general oversight of revenue collection, bill payment, payroll, budget, and other general fiscal management services.
Code Enforcement	Code Enforcement Officers Clerical	The Code Enforcement Officer enforces State and Town Codes, issues building permits, etc.
Property Assessments	Assessor Assistant Assessor Clerks	Depending on the time of year, some of the functions performed by people holding these positions could be scaled back and/or performed from off-site locations or via remote access by limited staff.
Tax Collection	Receiver of Taxes Deputy Receiver of Taxes	Most functions performed by people in these positions must be done on-site, but the presence of all staff may not be necessary at all times.
Water Services	Meter Reader	Reads district meters.
Sewer Services	STP Operators	Sewer treatment can't be done remotely.

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

Reducing Risk Through Remote Work and Staggered Shifts

Through assigning certain staff to work remotely and by staggering work shifts, we can decrease crowding and density at work sites and on public transportation.

Remote Work Protocols

Non-essential employees and contractors able to accomplish their functions remotely will be enabled to do so at the greatest extent possible. Below are Remote Work Protocols:

1. The Supervisor of the Town of Cornwall, their designee, or their successor holds the authority to identify non-essential staff who will work remotely.
2. The Supervisor of the Town of Cornwall, their designee, or their successor holds the authority to approve certain staff to work remotely.
3. The Supervisor of the Town of Cornwall, their designee, their successor and/or the Department Head will assign work to be accomplished remotely.
4. The Supervisor of the Town of Cornwall, their designee, their successor and/or the Department Head will equip staff for remote work with, but not limited to, the following:
 - a. Internet capable laptop
 - b. Necessary peripherals
 - c. Access to VPN and/or secure network drives

- d. Access to software and databases necessary to perform their duties
- e. Telecommunications by forwarding phone calls to off-site staff.

Further, business hours and locations of Town government may be altered to best accommodate actions taken to protect the health of Town employees and the public. Alterations to building access and the means by which the public interacts with Town employees may also be made in order to further these goals. Protective actions may include, but not be limited to: the closing of Town offices; the limiting of hours Town offices shall be open to the public; occupancy restrictions; the installation of protective barriers and/or spacing requirements; requiring all employees and/or members of the public to undergo temperature checks before work/entry to Town offices/buildings and/or wear PPE during same; and increased work via internet, phone, or other means. Protective actions will be taken in accordance with County and State Health Department, and CDC guidelines and requirements.

Staggered Shifts

Implementing staggered shifts may be possible for personnel performing duties which are necessary to be performed on-site but perhaps less sensitive to being accomplished only within normal business hours. As possible, management will identify opportunities for staff to work outside normal business hours as a strategy of limiting exposure. Regardless of changes in start and end times of shifts, the Town of Cornwall will ensure that employees are provided with their typical or contracted minimum work hours per week. Staggering shifts requires:

1. The Supervisor of the Town of Cornwall, their designee, or their successor holds the authority to identify positions for which work hours can/will be staggered.
2. The Supervisor of the Town of Cornwall, their designee, or their successor holds the authority to approve implementation of staggered shifts.
3. The Supervisor of the Town of Cornwall, their designee, their successor and/or the Department Head will assign the change in work hours to the previously identified positions.
4. The Department Heads will provide these employees necessary access to buildings and equipment to perform their duties safely during off-hours.

Personal Protective Equipment

The use of personal protective equipment (PPE) to reduce the spread of infectious disease is important to supporting the health and safety of our employees and contractors. PPE which may be needed can include, but is not limited to:

1. Masks
2. Face shields
3. Gloves
4. Disposable gowns and aprons
5. Cleaning supplies to sanitize surfaces
6. Hand soap and hand sanitizer

Protocols for providing PPE include the following:

1. Perform Routine Inventory of PPE supplies based upon department needs/usage.
2. Procurement of PPE:
 - a. The Town of Cornwall will provide at least two pieces of each required type of PPE to each essential employee during any given work shift for at least eight weeks.
 - b. The Town of Cornwall will maintain an eight-week supply of PPE to mitigate supply chain disruptions.
3. Storage of, access to, and monitoring of PPE stock:
 - a. PPE will be stored on shelving and secured by the Highway Superintendent at the highway garage.
 - b. Department Heads will have immediate access to PPE in the event of an emergency.
 - c. The supply of PPE will be monitored, routinely inventoried, and replenished to ensure integrity and to track usage rates.

The town will adhere to all CDC, DOH, OSHA/PESH guidelines/requirements and that depending on the disease/hazard, the employer will conduct a hazard risk assessment at that time to determine what controls including specific PPE that will need to be in place.

Staff Exposures, Cleaning, and Disinfection

Staff Exposures

Staff exposures are organized under several categories based upon the type of exposure and presence of symptoms. Following all federal, state, local, and CDC guidelines, we have established the following protocols:

1. If employees or contractors are exposed to a known case of communicable disease that is the subject of the public health emergency:
 - a. Potentially exposed employees or contractors who do not have symptoms should follow all federal, state, local, and CDC guidelines for the communicable disease in question.
 - i. As possible, these employees will be permitted to work remotely during this period of time if they are not ill.
 - ii. Department Heads must be notified of the potential exposure to make certain these protocols are followed.
2. If an employee or contractor exhibits symptoms of the communicable disease that is the subject of the public health emergency:
 - a. Employees and contractors who exhibit symptoms in the workplace should be immediately separated from other employees, customers, and visitors. They should immediately be sent home with a recommendation to contact their physician.
 - b. Employees and contractors who exhibit symptoms outside of work should notify their supervisor and stay home, with a recommendation to contact their physician.
 - c. Employees should not return to work until they have met the criteria to discontinue home isolation per all federal, state, local, and CDC/public health guidance and have consulted with a healthcare provider.
 - d. The Town of Cornwall will not require sick employees to provide a negative test result for the disease in question or healthcare provider's note to validate their illness, qualify for sick leave, or return to work, unless there is a recommendation from any federal, state, local, and/or CDC/public health officials to do so.

- e. Department Heads must be informed in these circumstances and are responsible for ensuring these protocols are followed.
- 3. If an employee or contractor has tested positive for the communicable disease that is the subject of the public health emergency, the Town of Cornwall will:
 - a. Apply the steps identified in Item 2, above, as applicable.
 - b. Areas occupied for prolonged periods of time by the subject employee or contractor will be closed off.
 - i. For the time period recommended or implemented by any federal, state, local, and CDC/public health guidance for the public health emergency in question.
 - ii. Any common areas entered, surfaces touched, or equipment used shall be cleaned and disinfected immediately.
 - c. Identification of potential employee and contractor exposures will be conducted.
 - i. If an employee or contractor is confirmed to have the disease in question, the Orange County Health Department, Town administration and/or their designee should inform all contacts of their possible exposure. Confidentiality shall be maintained as required by the Americans with Disabilities Act (ADA).
 - ii. Apply the steps identified in Item 1, above, as applicable, for all potentially exposed personnel.
 - d. The Supervisor must be notified in these circumstances and is responsible for ensuring these protocols are followed.

We recognize there may be nuances or complexities associated with potential exposures, close contacts, symptomatic persons, and those testing positive. We will follow all federal, state, local, and CDC/public health recommendations and requirements and coordinate with our local public health office for additional guidance and support as needed.

Cleaning and Disinfecting

All federal, state, local, and CDC/public health guidelines will be followed for cleaning and disinfection of surfaces/areas during the public health emergency.

Employee and Contractor Leave

Employee and contractor leave will be made available to the affected personnel in accordance with all federal, state, and local regulations and/or laws as they relate to the declared public health emergency.

Documentation of Work Hours and Locations

In a public health emergency, it may be necessary to document work hours and locations of each employee and contractor to support contact tracing efforts. Identification of locations shall include on-site work and off-site visits. This information may be used by the Town of Cornwall contact tracing within the organization and may be shared with local public health officials. The documentation and notification protocols are:

1. The Department Head will keep track of work hours and work locations through a daily work log submitted by each employee, in writing, at the end of each work shift during the public health emergency.

2. The Department Head will provide these written logs to the Orange County Health Department, Town administration and/or their designee who will be responsible to inform all contacts of their possible exposure. Confidentiality shall be maintained as required by the Americans with Disabilities Act (ADA).

Housing for Essential Employees

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

If such a need arises, the Town of Cornwall will communicate with the Orange County Emergency Management Office to help identify and arrange for these housing needs. Town administration is responsible for coordinating this effort.