NY HERO ACT

Airborne Infectious Disease Exposure Prevention Plan

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

Employees should report any questions or concerns with the implementation this plan to the designated contacts listed on Page 2.

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

As of the date of this publication, the Commissioner of Health has designated that COVID-19 is an airborne infectious disease and Brighton Securities is required to implement the following workplace safety plan.

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I. Responsibilities

This plan applies to all employees of Brighton Securities and all work sites:

1703 Monroe Avenue Rochester, NY 14618
212 E. Main Street Batavia, NY 14020
14 Market Street Lockport, NY 14094

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

Name	Title	Location	Phone
Danielle Wilkins	Chief Administrative Officer	1703 Monroe Avenue Brighton, NY 14618	585-340-2228
Lori Alberts	Chief Compliance Officer	1703 Monroe Avenue Brighton, NY 14618	585-340-2235

II. Exposure Controls During a Designated Outbreak

A. Minimal Controls During an Outbreak

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

1. **General Awareness:**
   Individuals may not be aware that they have the infectious disease and can spread it to others. Employees should remember to:
   - Maintain physical distancing;
   - Exercise coughing/sneezing etiquette;
   - Wear face coverings and personal protective equipment (PPE), as appropriate;
   - Individuals limit what they touch;
   - Stop social etiquette behaviors such as hugging and hand shaking, and
   - Wash hands properly and often.

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

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

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

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

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

   ☒ Restricting or limiting customer or visitor entry;

   ☒ Limiting occupancy;

   ☒ Allowing only one person at a time inside small, enclosed spaces with poor ventilation;

   ☒ Physical barriers;

   ☒ Signage;

   ☒ Telecommuting;

   ☒ Remote meetings;

   ☒ Preventing gatherings;

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

   - Touching your eyes, nose, or mouth;
   - Touching your mask;
   - Entering and leaving a public place; and
   - Touching an item or surface that may be frequently touched by other people, such as door handles, tables, gas pumps, shopping carts, or electronic cashier registers/screens.

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

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

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

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

B. Advanced Controls During an Outbreak

For activities where the minimum controls alone will not provide sufficient protection for employees, Brighton Securities may enact additional controls as listed below:

1. Brighton Securities may suspend or eliminate of risky activities where adequate controls could not provide sufficient protection for employees.

2. Change layout or minimize use of areas where employees may congregate (e.g., lunch room)

3. Enact policies and work rules to prevent exposure. Examples may include:

    - Increasing the space between workers;
    - Disinfecting procedures for specific operations;
    - Employee training;
    - Identify and prioritize job functions that are essential for continuous operations;
    - Cross-train employees to ensure critical operations can continue during worker absence;
    - Limit the use of shared workstations;
    - Post signs reminding employees of respiratory etiquette, masks, handwashing;
    - Rearrange traffic flow to allow for one-way walking paths;
    - Provide clearly designated entrance and exits;

4. Personal Protective Equipment (PPE) devices will be provided, used and maintained in a sanitary and reliable condition at no cost to the employee. The PPE provided to an employee will be based on a hazard assessment for the workplace.

PPE Required - Activity Involved/Location:
Face coverings

C. Exposure Control Readiness, Maintenance and Storage

Face coverings will be obtained, properly stored, and maintained so that they are ready for immediate use in the event of an infectious disease outbreak.

III. Cleaning During A Designated Outbreak

A. Disinfection Methods and Schedules

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

B. Adjustments to Normal Cleaning Procedures

Normal cleaning duties and schedules will continue to be three times per week. However, routine procedures may need to be adjusted and additional cleaning and disinfecting may be required based on the most current practices recommended by NYS Department of Health and/or CDC.

C. If an employee develops symptoms of the infectious disease at work, it is ideal to isolate the area in accordance with guidance issued by NYSDOH and/or the CDC, before cleaning and disinfecting the sick employee's work area. This delay will allow contaminated droplets to settle out of the air and the space to be ventilated.

D. As feasible, liners should be used in trash containers. Empty the containers often enough to prevent overfilling. Do not forcefully squeeze the air out of the trash bags before tying them closed. Trash containers may contain soiled tissue or face coverings.

IV. Infection Response During a Designated Outbreak

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

- Instruct the sick individual to wear a face covering and leave the worksite and follow NYSDOH/CDC guidance.
- Follow local and state authority guidance to inform impacted individuals.

V. Training and Information During a Designated Outbreak

The CAO or COO will verbally inform all employees of the existence and location of this Plan, the circumstances it can be activated, the infectious disease standard, employer policies, and employee rights under the HERO Act.

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

- The infectious agent and the disease(s) it can cause;
- The signs and symptoms of the disease;
- How the disease can be spread;
- An explanation of this Exposure Prevention Plan;
- The activities and locations at our worksite that may involve exposure to the infectious agent;
- The use and limitations of exposure controls;

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

The training will be:

- Provided at no cost to employees and take place during working hours. If training during normal work hours is not possible, employees will be compensated for the training time (with pay or time off);
- Appropriate in content and vocabulary to your educational level, literacy, and preferred language; and
- Verbally provided in person or through telephonic, electronic, or other means.

VI. Plan Evaluations During a Designated Outbreak

Brighton Securities will review and revise the plan periodically, upon activation of the plan, and as often as needed to keep up to date with current requirements. Any revisions to this plan will be documented below:

Plan Revision History			
Date	**Participants**	**Major Changes**	**Approved By**

VII. Retaliation Protections and Reporting of Any Violations

No employer, or his or her agent, or person, acting as or on behalf of a hiring entity, or the officer or agent of any entity, business, corporation, partnership, or limited liability company, shall discriminate, threaten, retaliate against, or take adverse action against any employee for exercising their rights under this plan, including reporting conduct the employee reasonably believes in good faith violates the plan or airborne infectious disease concerns to their employer, government agencies or officials or for refusing to work where an employee reasonably believes in good faith that such work exposes him or her, other workers, or the public to an unreasonable risk of exposure, provided the employee, another employee, or representative has notified the employer verbally or in writing, including electronic communication, of the inconsistent working conditions and the employer's failure to cure or if the employer knew or should have known of the consistent working conditions.

Notification of a violation by an employee may be made verbally or in writing, and without limitation to format including electronic communications. To the extent that communications between the employer and employee regarding a potential risk of exposure are in writing, they shall be maintained by the employer for two years after the conclusion of the designation of a high-risk disease from the Commissioner of Health, or two years after the conclusion of the Governor's emergency declaration of a high-risk disease.

To report violations of this plan and/or retaliation, employees should contact the COO, CAO or Human Resources.