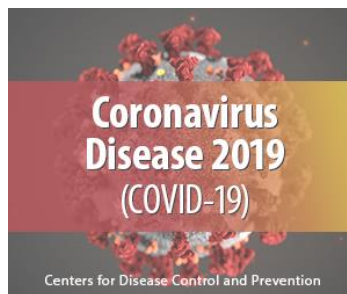




# **Infectious Disease Preparedness and Response**

## **Plan (IDPR Plan)**

# **May 2020**



## Message from The President

We hope that you and your families are staying healthy.

We are more excited than ever to welcome Hanna Interpreting Services LLC Team Members back to work. To those who have continued to work from home during this time, thank you for your support of our critical operations. And to all, thank you for your commitment and dedication during this unprecedented time.

As the events surrounding COVID-19 continue to evolve rapidly, we remain fully dedicated to the safety, health and well-being of our Team Members. The world has changed which means our processes need to adapt to ensure we continue to carry out our mission and serve customers safely. The purpose of this playbook is to provide Team Members, Clients and Independent Contractors with safety protocols and steps to take to help keep yourself and the community safe.

This playbook is based upon guidance as provided by the Centers for Disease Control and Prevention (CDC), Department of Health and Human Services pursuant to the Occupational Safety and Health Act (OSHA), the World Health Organization (WHO) and other regional health guidance. We are monitoring their guidance regularly.

At the end of this document you will find links to a COVID-19 SharePoint and other resources with up-to-date information on our safety procedures.

Please do not hesitate to contact me or the other members of Management with suggestions or feedback. We are all here to support you and your departments, so do not hesitate to reach out to us as we return to operations. For HR related questions, you can also contact the Director of Human Resources.

Thank you for doing your part to keep Hanna Interpreting Services LLC, moving forward and helping people, using language and technology to bring the world together.

Stay Safe,

Tom Hanna  
President.

## **Table of Contents:**

- 1-1. Infectious Disease Preparedness and Response Plan (IDPR Plan)
- 1-2. Crisis Management Team Responsibilities
- 1-3. Safety Guidelines
- 1-4. Daily Health Check
- 1-5. Using Social Distancing Measures to Help Protect
- 1-6. Observe Basic Infection Prevention Measures
- 1-7. Actions To Take If You Are Sick
- 1-8. Preparing the Workplace for You
- 1-9. Wellness Checks at Work
- 1-10. Body Temperature Monitoring
- 1-11. Health Screening Inquiries
- 1-12. Wellness Check Process
- 1-13. Open Door Policy
- 1-14. Additional References

## **1-1. Infectious Disease Preparedness and Response Plan (IDPR Plan)**

### ***Purpose***

COVID-19 is having a major impact around the world and in our communities. Certain industries are particularly vulnerable such as Healthcare, Grocery Stores and other essential businesses. Although Hanna Interpreting Services LLC is considered a Low Risk Organization we have implemented this Infectious Disease Preparedness and Response Plan for our Team Members and Stakeholders.

This plan has been created specifically for the purpose of establishing guidelines for all company Team members during the COVID-19 pandemic. We have taken preliminary actions to reduce the possibility of contamination or spread of the virus by temporarily implementing a work from home program. We anticipate resuming normal business activities when the Federal, State and/or Local Government agencies advise us to do so. This plan has been developed to reduce the impact of COVID- 19 outbreak conditions in the workplace. It is of utmost importance that all staff adhere to this plan.

Our goal is to protect the safety of our Team Members as well as others who may need to enter our office who may have been exposed to this health threat. These guidelines have been established to prevent infection and transmission of this virus to Team Members through contact with other staff, family members, contractors, vendors, clients, and other members of the public. Other risk factors may include individuals 50 or older, or those who have chronic health conditions such as diabetes, lung disease, cancer, heart disease, kidney disease, and severe obesity.

We will adhere to all recommendations and guidelines that are disseminated from the Center for Disease Control (CDC), World Health Organization (WHO), New York State Department of Health (NYSDOH), New York City Department of Health (DOH) and guidance from other city, state or federal authorities.

The health and safety of our Team Members is of utmost importance and will continue to be our top priority. Given the rapidly changing conditions and environment of this crisis, this plan may be updated if guidelines change.

As a company, we have implemented a crisis management team consisting of the President, V.P of Operations, Director of Services and Director of Human Resources to obtain and distribute timely information to all staff.

## **1-2. Crisis Management Team Responsibilities**



The COVID-19 team will manage and perform the following during this crisis:

- Anticipate and prepare for any risks to our health.
- Evaluate risks and their impact on Team Members.
- Immediately mitigate any risk.
- Re-evaluate risks frequently.
- Disseminate information to all Team Members in a timely manner.
- Select, implement, and ensure Team Members use controls to prevent exposure, including physical barriers to control the spread of the virus; social distancing; appropriate personal protective equipment; good hygiene, and cleaning supplies.
- If cases occur, we will record COVID-19 work related cases in accordance with OSHA requirements, conduct an investigation, and implement measures to prevent recurrence as feasible.
- Take any new steps to protect Team Members from illness and adjust IDPR plan as needed.

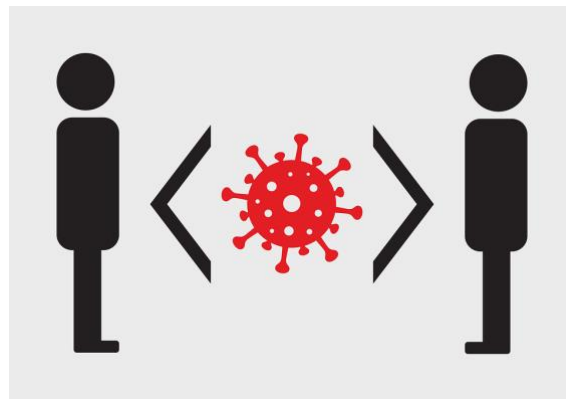
## **1-3. Safety Guidelines**

The following procedures outline how we are helping to keep you safe upon returning to work

- Increased cleaning and disinfecting work areas and office spaces and equipment
- Providing and enforcing social distancing in workplace
- Providing outdoor break areas,
- Spacing of workstations and barriers as needed
- Providing PPE or other protective equipment as necessary
- Daily Health Checks

## **1-4. Daily Health Check**

- **Bring and wear your personal protective equipment (PPE)** – You are required to wear your PPE's when interacting with others. Keep at **least a six feet or the governmental recommended distancing practice**. This includes while in team meetings, and break areas. Barriers and/or PPE added where separation is not possible. (You may bring or make your own PPEs following the Center for Disease Controls guidance.)
- **Complete self-health check** – Before you come to work, ensure you're healthy. If you are sick, have COVID-like symptoms, have been around someone with COVID or have reason to believe you may have the virus, tell your supervisor and stay home.
- **Expect to be temperature screened when arriving at work**– Temperature or symptom screening and daily health checks will be required upon arriving to work. (Please refer to the Screening Procedures section of this plan for more information.)
- **Clean your PPE daily** – If using Non-disposable eye protection should be cleaned each day and if someone coughs or sneezes near you. Reusable face coverings should be washed daily.
- Team Members who have come within six feet of someone who is known to be infected should notify their supervisor or Human Resources and self-quarantine for 14 days after their last exposure per the [Centers for Disease Control and Prevention \(CDC\)](#). During this time, they should take their temperature twice a day and watch for symptoms of COVID-19. Currently, the known symptoms of COVID-19 include fever, cough, sore throat, muscle pain, chills, new loss of taste or smell, or shortness of breath.



**Patients with COVID-19 have experienced mild to severe respiratory illness.**

**Symptoms\* can include**

**FEVER**



**COUGH**



**\*Symptoms may appear 2-14 days after exposure.**

**SHORTNESS OF BREATH**



**Seek medical advice if you develop symptoms, and have been in close contact with a person known to have COVID-19 or if you live in or have recently been in an area with ongoing spread of COVID-19.**



CS 315252-A 03/03/2020

For more information: [www.cdc.gov/COVID19-symptoms](http://www.cdc.gov/COVID19-symptoms)

## 1-5. Using Social Distancing Measures to Help Protect

- **Don't host large gatherings or meetings** – Use video-conferencing and minimize large gatherings. If it needs to be in person, follow face covering and six feet distancing guidelines. No large group meetings or gatherings.
- **Minimize carpool and public transport** – If you need to utilize carpooling and public transit to and from work, practice social distancing, wash or sanitize your hands, and consider wearing face coverings.
- **Controlling access** to our facilities by eliminating unnecessary visitors and implementing **temperature checks** or other symptom screenings if visitors must come to the office This includes delivery personnel dropping off mail and packages. A drop off point will be designated and PPE's used before signing for any documents.
- **Adjusting work shifts** in some areas the Company may reduce the number of Team Members in a particular area at one time
- Providing **personal protective equipment (PPE)** including face coverings and gloves in kitchen and bathroom areas
- Implemented **“touchless”** services wherever possible and where not possible Team Members must don PPEs before using equipment which is shared by others.
- **Suspended visitors**

## 1-6. Observe Basic Infection Prevention Measures

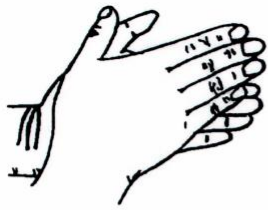
Avoid exposure to the virus by limiting contact with others and maintaining a social distance of 6' away from others in the office, gatherings, meetings and training sessions.

**Wash hands with hot water and anti-bacterial soap for 20-30 seconds at a time and after:**

- Handling or touching common surfaces such as: door- knob, button, light fixture, etc
- Coughing, sneezing, blowing nose
- After any time spent in a public space.
- Use alcohol sanitizer (containing at least 60% alcohol) intermittently throughout the day.
- Do not touch eyes, nose, ears, mouth or face before thoroughly washing your hands.
- It is especially important to clean hands after going to the bathroom, before eating, and after coughing, sneezing, or blowing your nose.
- Cover coughs or sneezes with a tissue or cloth or garment while tilting your head downward; or do so into your elbow.
- Discard any tissue used for wiping the face, nose, mouth or eyes in your personal trash cans provided throughout the site. Each Team Member is responsible for taking out their own trash daily.
- Clean and disinfect working surfaces, telephones, keyboards, laptops regularly with bleach or bacterial disinfectant.



- Do not congregate at desks, breakrooms, or conference rooms in the office and do not participate in parties, or other non-essential establishments other than a food market, pharmacy or health-care facility. Limit travel outside of your homes to essential travel.
- Monitor yourself for any symptoms such as a fever, cough, or respiratory difficulty.
- Do not interact with delivery personnel or touch public devices with bare hands. Wear vinyl, latex, nitrile or work gloves when using shared tools or equipment such as copiers, printers or file cabinets at all times. Always change gloves before eating, touching your face or drinking.
- Don't shake hands when greeting others.



1. Palm to palm



2. Right palm over left dorsum, left palm over right dorsum.



3. Palm to palm, fingers interlaced.



4. Backs of fingers to opposing palms with fingers interlaced.



5. Rotational rubbing of right thumb clasped over left palm & left thumb over right palm.



6. Rotational rubbing backwards and forwards with clasped fingers of right hand in palm of left hand and vice-versa.

*Hands and wrists rubbed till end of 10 sec period. The number of strokes in each step is five.*

# STOP THE SPREAD OF GERMS

Help prevent the spread of respiratory diseases like COVID-19.

Avoid close contact with people who are sick.



Cover your cough or sneeze with a tissue, then throw the tissue in the trash.



Avoid touching your eyes, nose, and mouth.



Clean and disinfect frequently touched objects and surfaces.



Stay home when you are sick, except to get medical care.



Wash your hands often with soap and water for at least 20 seconds.



For more information: [www.cdc.gov/COVID19](http://www.cdc.gov/COVID19)

### **1-7. Actions To Take If You Are Sick:**

- If you are experiencing the CDC identified virus symptoms, such as coughing, fever, sore throat, and/or shortness of breath, contact your physician or your local Department of Health to be screened and if appropriate, be tested for the virus. Stay home. **DO NOT GO TO WORK.** If mildly ill, most infected persons recover at home.
- Notify your supervisor immediately if you are sick, and/or experiencing any of the symptoms described in #1.
- Do not visit public areas.
- Do not take public transportation.
- Wear an approved face-mask or N-95 respirator when in public to avoid transmission to others (\*OSHA has suspended the enforcement of fit-testing during this crisis. However, unless in a crisis or emergency, ensure that you have been evaluated and fit-tested prior to donning a respirator).
- Contact a physician or your local Health Department to be screened via telephone and if necessary, be scheduled for testing and/or treatment.
- Do not visit a physician without an appointment and guidance from such a physician.
- Isolate yourself from family members and use a separate bathroom and bedroom.
- Cough and sneeze into a tissue and discard in plastic bags; or cough into your elbow and always away from others.
- Take all precautions to maintain a clean environment including the washing of hands, disinfecting touch-points such as doors, handles, tools, equipment, counters, phones, etc.
- Stay a minimum of a 6' distance away from others.
- Do not share clothing, sleeping quarters, utensils, glassware, towels, bathrooms, etc., with any family member.
- Maintain electronic communication with physicians, family members and your supervisor as to your status.
- If you experience warning signs that reflect any of the following, seek medical attention immediately by calling 911:
  - Difficulty breathing
  - Pain or pressure in chest
  - Blue-ish lips
  - Confusion
- Do not return to work unless: you have no fever for at least 72 hours (without using fever reducing medication), any other symptoms are gone, or at least 3 days have passed since a physician has given you medical clearance to return to work.

### **1-8. Preparing the Workplace for You:**

The Company has made the following adjustments to the workplace to prepare Team Members to resume operations.

- Provide tissues, no-touch trash cans, hand soap, alcohol-based hand rubs containing at least 60% alcohol for Team Member use.
- Provide cleaners, disinfectants and disposable towels for Team Members to clean their work surfaces.
- Require regular hand washing or using of alcohol-based hand rubs.
- Team Members must always wash hands when they are visibly soiled and after removing any PPE. (Please refer to our Safety and Health Program for specific OSHA requirements regarding PPE and other related standards.)
- Updated the facility with appropriate posters and reminders for preventing the spread of COVID-19 and other airborne illnesses.
- Posted signs throughout the site with COVID-19 information and preventive measures.
- Created Outdoor Break areas with appropriate spacing.
- Adjusted workstations to accommodate for appropriate social distancing in the workplace.
- Implementation of health checks upon arrival to work
- Provide Team Member Training on new procedures for cleaning, PPE's, disposal of PPEs and symptom awareness.
- Regular ongoing cleaning of work-stations and work areas
- Management will continue to stay informed of updates to the Pandemic Crisis and its effect on the workplace and Team Members.

It is imperative for every one of us to heed the instructions in this plan to avoid and eliminate infection. We are committed with the world to eradicating this virus by taking these steps and following guidelines disseminated by Government agencies. We are in this together, let's all work together to protect ourselves, our co-workers and family.

These guidelines do not take the place of any instructions by your physician if you are experiencing any symptoms of COVID-19.

### **1-9. Wellness Checks at Work**

The lifting of stay-at-home orders will likely precede the disappearance of COVID-19. Therefore, testing is a centerpiece of the Opening Up America Again framework. Hanna Interpreting Services LLC has opted to screen and monitor Team Members for the presence of the COVID-19 virus.

In accordance with the Americans with Disabilities Act ("ADA"), medical-related inquiries or medical screenings of current Team Members are limited to fitness for duty inquiries and other inquiries that are "job-related and consistent with business necessity," including to determine if an employee will pose a "direct threat" of harm due to a medical condition. Under recent Equal Employment Opportunity Commission ("EEOC") and CDC guidance, the COVID-19 pandemic

creates a sufficient risk to permit widespread screening based on the direct threat standard. As a result, employers may ask certain medical-related inquiries and require certain medical screening during the COVID-19 pandemic without violating the ADA. However, confidentiality and privacy rights as well as anti-discrimination protections will be implemented.

*Confidentiality and Employee Privacy.* Regardless of the method of Team Member monitoring, such screening or monitoring raises a myriad of considerations under state and federal confidentiality and privacy laws.

- *The ADA.* Any medical information gathered from employee or applicant screening, including body temperature checks, is subject to ADA confidentiality requirements, which means, among other things, that such information will be maintained in separate medical file and disclosure is limited.
- *State-Specific Privacy Laws.* Hanna Interpreting Services LLC will provide each Team Member a California Consumer Privacy Act Notification (CCPA) form outlining how the screening will be used or disclosed. The individual's right to privacy and the employer's legitimate interests, including an interest in protecting the health and safety of Team Members and the public.
- *Disclosing Information.* If an Team Member has COVID-19 or related symptoms, an employer may
  - Identify the name of the Team Member to applicable supervisors and managers on a need to know basis with respect to employee job restrictions and reasonable accommodations (with instructions to keep the Team Member's name confidential)
  - Interview the Team Member to identify the individuals with whom the Team Member had contact, which will allow the employer to conduct social tracing to determine whether any other co-workers may have been exposed to COVID-19 through the Team Member.
  - If the employer learns that other Team Members may have been exposed, then the employer should notify those affected of their potential exposure without disclosing the infected Team Member's identity. Team Members should follow the CDC Public Health Recommendations for Community-Related Exposure, which is available here: <https://www.cdc.gov/coronavirus/2019-ncov/php/public-health-recommendations.html>.
- *Coworker Reports.* If a coworker reports to the employer that another Team Member has COVID-19 symptoms, the employer should approach the potentially affected Team Member and attempt to verify the report immediately before taking any action. The rights of the reporting Team Member and the potentially exposed Team Member must be considered.

### **1-10. Body Temperature Monitoring.**

Taking a Team Member's body temperature and requiring a Team Member to submit to a questionnaire as part of COVID-19 screening all involve "medical examinations" under the ADA.

The EEOC guidance expressly permits temperature checks during the COVID-19 pandemic and, while the EEOC has not expressly addressed other types of medical examinations related to COVID-19, viral and antibody tests would presumably be permissible based on the same rationale. Therefore, the Company reserves the rights to implement additional testing and screening as recommended by CDC moving forward as needed.

Presently, the Company will be implementing the following health screenings upon arrival to work:

- *All Team Members will be Tested upon arrival to work.* All staff monitoring, screening or testing is conducted in a non-discriminatory manner with respect to protected categories such as age, national origin, pregnancy, and religion.
- *Wage and Hour Considerations.* The Company will bear the cost of the health screening and the Team Members will be paid for the time it takes to conduct the screening.
- *Establish, Communicate and Adhere to Clear and Uniform Standards.* The Company will monitor Team Member body temperatures. The temperature screening threshold will be 100.4 degrees as recognized by the CDC. and any Team Member who does not meet this threshold will be sent home for further screening by the Team Members doctor.
- On-site temperature checks will be conducted by properly trained personnel outfitted with appropriate personal protective equipment and utilizing a consistent mechanism to ensure consistent results.
- The Company will similarly perform such checks and screening of vendors and other visitors to the workplace as necessary.
- *Self-Reporting Procedures.* Alternatively, the Company will consider Team Members to self-report their body temperature taken prior to reporting to work documented along with the completion of symptom related screening questionnaire indicative of COVID-19 infection. These forms will also be maintained consistent with privacy issues.
- *Team Members that Refuse to Be Tested.* If a Team Member refuses to undergo a temperature check or other COVID-related test, the employer may bar the Team Member from the workplace. However, the Company will engage in an interactive meeting as to the reasons for the refusal in the event that there is a health-related or religious reason for the refusal or if more information or reassurances concerning confidentiality would be helpful.
- *Maintain Confidentiality of Test Records.* The Company will maintain a log of temperature checks or test results, but any COVID-19-related medical documentation will be kept separate from these logs or from regular personnel files per ADA rules that require that employers must keep protected medical information confidential.
- *Tracking Developments in COVID-19-Related Guidance.* The Company is aware that COVID-19 guidance changes rapidly, and at a certain point the risk of infection with COVID-19 may no longer be deemed a “direct threat” justifying widespread body temperature monitoring or other testing.

### **1-11. Health Screening Inquiries.**

In addition to taking body temperature readings the Company will make inquiries of Team Members. The following questions are permissible inquiries.

- *Inquiries About an Employee's Symptoms or Vulnerabilities.* The Company may ask Team Members who report feeling sick at work (or who call out sick) questions about their symptoms to assess their risk of having COVID-19. The Company may also consider proactively making COVID-19-related inquiries of their Team Members on a regular basis (e.g., at the start of each work day). Such inquiries will be in the form of a written questionnaire and may include questions such as, "Are you experiencing COVID-19 symptoms?" and "Have you been in close proximity to anyone who has been diagnosed with COVID-19 or who has COVID-19 symptoms?" Of course, a Team Member's confidential medical information elicited from these questions must be treated confidentially under the ADA, and any employment action taken based on the answers to any inquiry must be non-discriminatory.
- *Inquiries About an Asymptomatic Employee's Vulnerabilities.* According to the EEOC, for so long as the COVID-19 pandemic remains severe, the Company may have sufficient objective evidence to reasonably conclude that certain Team Members will face a direct threat of death or serious harm if they contract COVID-19. Only in this circumstance may the Company make disability-related inquiries of asymptomatic Team Members to identify those at higher risk of complications. The Opening Up America Again guidelines identify "vulnerable individuals" 2 and state that employers should consider "special accommodations" during the first two phases of the plan. In light of this, the Company will include in the health screening an invitation for Team Members who qualify as vulnerable individuals under the Opening Up America Again guidelines to self-identify so that the company may consider special accommodations for such Team Members during the pandemic.
- *Inquiries About Contacts with Others.* The Company may also ask Team Members whether they have been in close proximity to anyone diagnosed with or exhibiting symptoms of COVID-19. The Company will not ask specifically about whether family members have COVID-19, as such inquiries may violate the Genetic Information Nondiscrimination Act.
- *Inquiries About Activities.* The Company may further ask Team Members whether they have followed social distancing protocols, avoided large gatherings, washed their hands often and covered their mouth and nose with a cloth face cover when around others in public in an attempt to assess any risks posed to other Team Members. The Team Member should feel free to respond to these questions without fear of reprisal and privacy laws protect Team Members from adverse action.
- *Inquiries of Applicants.* The Company will screen job applicants for symptoms of COVID-19 after making a conditional job offer, as long as all Team Members in the same job category are subject to the same screening requirements.

*Fitness for Duty Certifications.* As an alternative or accompaniment to a test request, the

Company may also require that a Team Member provide a Fitness for Duty Certification from a doctor before returning to the workplace after staying home due to illness. As a practical matter the Company understands that at times there are delays in a Team Member's ability to get a doctor's appointment immediately after a stay-at-home order is lifted. According to both EEOC and OSHA recommendations, the Company will consider accepting other, less time-intensive certifications, such as an email or form from a local clinic certifying that the employee has tested negative or completed a 14-day quarantine.

### **1-12. Wellness Check Process**

- All Team Members will receive and sign for the California Privacy Protection Act Notification and upon return to work upon being given a wellness check will be provided a copy of the Notice upon Collection Form to read..
- Trained Manager or Director will take Team Member's Temperatures upon arrival and conduct appropriate verbal questioning. If Team Member is cleared they can go about their normal day.
- If the Manager or Director determines that a Team Member's fever is outside of limits the Manager/Director records the information on the Individual Record form and follows up with additional assessment questions documented.
- The Team Member is sent home along with FFCRA Request Form, Procedures on follow up and Testing Sites..
- Management will determine if there is additional staff exposure or concern and respond accordingly.
- If a Team Member reports to work and subsequently sent home awaiting a COVID-19 test results, monitoring and separation of any exposed personnel will result through either remote working assignments, additional distancing measures or leave pending medical clearance if necessary.
- Team Members will follow the Return to work Policy Post Stay At Home Orders.
- Human Resources completes any required OSHA or CDC COVID-19 documentation.

### **1-13. Open Door Policy**

As with all Company Policies, Hanna Interpreting Services LLC encourages Team Members to feel comfortable discussing concerns with members of the management team without fear of reprisal. Our Open Door Policy extends to information contained in this Infectious Disease and Response Plan. We encourage open dialogues regarding our wellness checks, cleaning standards, return to work expectations and FFCRA practices.

### **1-14. Additional References**

- Hanna Interpreting Services LLC How to Clean: [How to clean and disinfect](#)
- Hanna Interpreting Services Office Distancing Plan - will be determined and shared once we get closer to our In Office return date.



- Poster for Front Door: [COVID Posting on Front Door](#)
- California Consumer Privacy Act Notification: [CCPA Notification](#)
- Notification at Collection: [Notice at Collection](#)
- Health Check In Sheet: [COVID19 Health Screening Check In](#)
- Positive Medical Screening Response; Individual Screening Form: [Individual Screening Form Covid-19](#)
- Testing Sites and Follow Up Contact Information: [Testing and Follow Up Form](#)
- FFCRA Policy and Request form: [FFCRA Policy and Request Form](#)
- Return to work: [Return to Work Policy Post Stay At Home Orders](#)