

Buffalo & Erie County Public Library
PERSONNEL POLICIES AND PROCEDURES MANUAL

SUBJECT: Protective Measures to Reduce Risk of Exposure to COVID-19

CHAPTER: VIII

SECTION: 14

EFFECTIVE DATE: 5/26/2020

REVISION DATE: 10/21/2020

The policies set forth are applicable to all libraries in the B&ECPL System. Each individual library shall establish its own set of procedures to effectuate this Policy.

I. STATEMENT OF POLICY

As New York State, Erie County and local governments phase out their stay-at-home orders enacted in response to COVID-19, the Buffalo & Erie County Public Library (B&ECPL) will be faced with new challenges regarding the safety of workers. To reduce the risk of exposure to COVID-19 in the workplace, the B&ECPL has developed and implemented proactive prevention measures, in addition to existing standards, and a plan to communicate these measures, policies and procedures to all staff System-wide prior to re-entry to the workplace. All practices and policies shall comply with federal, state and local laws and executive orders.

II. BUSINESS PRECAUTIONS

The B&ECPL will adhere to all “Business Precautions” set forth in Governor Cuomo’s NY Forward Plan prior to reopening libraries. Each business and industry must have a plan to protect employees and consumers, make the physical work space safer and implement processes that lower risk of infection in the business:

- Adjust workplace hours and shift design as necessary to reduce density in the workplace;
- Enact social distancing protocols;
- Restrict non-essential travel for employees;
- Require all employees and customers to wear masks if in frequent contact with others;
- Implement strict cleaning and sanitation standards;

- Enact a continuous health screening process for individuals to enter the workplace;
- Continue tracing, tracking and reporting of cases;
- Develop liability processes.

III. COVID 19 RELATED INQUIRIES

A. Report of Symptoms at Work or Calling In Sick

1. During the declared pandemic, employers may ask employees who report feeling ill at work, or who call in sick, questions about their symptoms to determine if they have or may have COVID-19.
2. Pursuant to CDC guidance, these symptoms currently include fever, chills, cough, shortness of breath, loss of taste or smell, and sore throat.
3. Employers also may measure employees' body temperature before they enter the workplace.
4. All information pertaining to an employee reporting a fever or other symptoms should be treated as confidential medical information.

B. Pre-Shift Screening

1. During the current pandemic, employers may ask employees if they are experiencing symptoms of COVID-19.
2. This may be done at the beginning or prior to each shift.
3. Employers may require employees, before they enter the workplace, to complete a questionnaire that lists each of the symptoms.
4. All information or records of these COVID-related inquiries must be treated as confidential medical information, maintained by Human Resources, and kept separate from employee personnel files.

C. Taking Temperatures

1. Fever of 100.4 degrees or higher is a symptom of COVID-19.
2. It is permissible and recommended for employers to take the temperatures of employees or to request employees to take their own temperatures before the beginning of the work shift (before entering the workplace, if practicable).
3. Any record or log of temperatures must be treated as confidential medical information, maintained by Human Resources, and kept separate from employee personnel files.

IV. RETURN TO WORK PRECAUTIONS

A. Daily Wellness Checks

1. All B&ECPL employees who enter the workplace will be screened each day prior to or upon entry to all B&ECPL libraries.

2. Screening shall include taking temperature and completing health questionnaire daily. A privacy notice and copy of this policy will be provided at the first screening.
3. All screening will be conducted on a nondiscriminatory basis.
 - a. The B&ECPL will adhere to the guidance of Equal Employment Opportunity Commission (EEOC) issued to employers regarding best practices for balancing obligations under the ADA while still complying with guidelines from the Centers for Disease Control and Prevention (CDC).
 - b. The EEOC reminds employers that "[t]he ADA and the Rehabilitation Act do not interfere with employers following advice from the CDC and other public health authorities on appropriate steps to take relating to the workplace" regarding COVID-19.
4. Records for employees shall be maintained separate from their personnel file in the Human Resources Department. Contract libraries shall forward all records to HR weekly and shall not maintain copies.

B. Screening Results

1. Temperature 100.4 or above:
 - a. Employee will not be allowed entry.
 - b. Employee will be instructed to contact Health Care Provider.
 - c. Employee may utilize sick leave, or other applicable COVID-19 related paid leave.
 - d. Employee should follow-up with HR after contacting Health Care Provider.
 - e. The B&ECPL will follow CDC guidelines for return to work.
2. Affirmative response to inquiries in questionnaire will be discussed with employee; additional information may be requested in a confidential manner (ie. not in front of other employees) to determine if employee should be allowed entry. If an employee is denied entry based on responses:
 - a. Employee will be instructed to contact Health Care Provider.
 - b. Employee may utilize sick leave, or other applicable COVID-19 related paid leave.
 - c. Employee should follow-up with HR after contacting Health Care Provider.
 - d. The B&ECPL will follow CDC guidelines for return to work.

C. Process for Screening

1. Each Library shall establish screening procedure(s) for employees, vendors, partners, contract workers to facilitate daily COVID-19 screening prior to entry to the workplace.

2. Libraries must make efforts to avoid large numbers of employees waiting for testing and shall employ appropriate social distancing measures while waiting.
3. Where practicable, supervisors are advised to stagger shift start times.
4. Online self-health screening may be done using the online form provided to all libraries and available at <https://www.buffalolib.org/covid-19>.
 - a. It can be done from home, in the car, etc.
 - b. It must be completed before entering the building.
 - c. The online screening requires individuals to take their own temperature.
 - d. This will reduce congestion at entrances and eliminate time spent at the door filling out paper forms before one's shift.
 - e. If an employee does not have a thermometer to use at home, HR has a supply of reusable strip thermometers they can provide upon request.
5. On site health screening must be done for vendors, partners, and contract workers prior to entry.
 - a. Vendors, partners, and contract workers with a temperature 100.4 or above, or whom provide an affirmative response to the symptom questions should not be allowed entry to the library.
6. Paper questionnaires and thermometers will be available at the designated entrance for self-assessment or assessment by the manager.
7. If an employee is unable to complete the online questionnaire prior to work they may utilize the paper questionnaires and thermometer for self-screening at the employee entrance.
8. Employees with a temperature 100.4 or above should not report to work. Employees who answer symptom questions with affirmative response should note if there is a known reason for the symptom (ex. Seasonal allergies and sneezing). If unable to note explanation for symptom, employee should not report and should contact their supervisor.

D. Refusal

1. Any employee refusing or failing to complete the pre-entry screening shall not be allowed entry to the library.
 - a. Employees refusing screening will be charged the time.
 - b. Sick leave cannot be used for a refusal.
 - c. Non-compliance with screening will result in disciplinary action.

2. Employees refusing testing on religious grounds should not be allowed entry to the library. They will be charged the time for the day, and asked to contact Human Resources via telephone.

E. Re-entry during work day

1. If an employee leaves their office area for a break, lunch or appointment, the employee does not have to have their temperature screened again for entry.
2. The employee must however perform precautionary measures such as hand cleaning hygiene upon re-entry to the building.

V. WORK DAY PREVENTION MEASURES

A. Personal Protective Equipment (PPE)

1. Employees will be provided PPE upon arrival on their first day returned to work.
2. Employees must wear a mask when working in public areas of the library, or when unable to socially distance a minimum of 6 feet from others during the workday.
3. Employees shall be responsible for bringing their mask to work daily, as well as other PPE provided.

B. Sanitary Practices

1. To help stop the spread of germs employees must:
 - a. Wash hands frequently throughout the day, and after blowing nose, coughing, sneezing or touching surfaces or objects that are frequently touched by others;
 - b. Wash their hands with soap and water for at least 20 seconds;
 - c. If soap and water are not readily available, use an alcohol-based hand sanitizer that contains at least 60% alcohol to clean hands;
 - d. Avoid touching their face with unwashed hands after touching contaminated surfaces or object;
 - e. Throw used tissues in the trash right away;
 - f. If an employee doesn't have a tissue, cough or sneeze into their elbow, not their hands.
2. Employees should not bring in food or other items for sharing with co-workers.

C. Employer Responsibilities

1. The B&ECPL will ensure access to PPE upon return to work and will provide hand sanitizer, tissues and other supplies, as set forth herein.
2. The B&ECPL will provide additional supplies upon notice from library director, branch manager, or department head.

D. Employee Responsibilities

1. It is the employee's responsibilities to comply with these prevention measures, whether in public or employee only areas of the library, and whether on work time, break, or before/after shift.
2. Failure to comply with these sanitary practices may result in disciplinary action.