



Niagara Frontier Transportation Authority

CONTINUITY OF OPERATIONS PLAN FOR A STATE DISASTER EMERGENCY INVOLVING A COMMUNICABLE DISEASE

Purpose

To ensure the continuation of services provided by the State of New York and the health and safety of the public sector workforce, each New York State agency and authority must prepare a plan for the continuation of operations in the event that the Governor declares a state disaster emergency involving a communicable disease.

Applicable agencies and authorities must post finalized plans by April 1, 2021 in (1) a clear and conspicuous location (e.g., bulletin boards or other similar location where employees normally view information posted by the employer), (2) in their employee handbook if they have one, and (3) on either their intranet or internet website.

Continuity of Operations Plan for a Disaster Emergency Involving a Communicable Disease

Individual(s) Responsible for Maintaining this Plan:

Lyle Death
Director, Health Safety & Environmental Quality
Lyle.Death@nfta.com
716-855-7388

Date of Posting:

April 1, 2021

Statutory Elements of the Plan:

- A list and description of the types of positions considered essential in the event of a state-ordered reduction of in-person workforce.

Essential shall refer to a designation made that a public employee is required to be physically present at a worksite to perform his or her job. Such designation may be changed at any time in the sole discretion of the employer.
- A description of protocols the employer will follow for non-essential employees to telecommute including, but not limited to, facilitating or requesting the procurement, distribution, downloading and installation of any needed technology, including software, data, and the transferring of office phone lines to work or personal cell phones as practicable or applicable to the workplace, and any devices.



Niagara Frontier Transportation Authority

CONTINUITY OF OPERATIONS PLAN FOR A STATE DISASTER EMERGENCY INVOLVING A COMMUNICABLE DISEASE

Non-essential shall refer to a designation made that a public employee is not required to be physically present at a work site to perform his or her job. Such designation may be changed at any time in the sole discretion of the employer.

- A description of how the employer will, to the extent possible, stagger work shifts of essential employees in order to reduce overcrowding on public transportation systems and at worksites.
- A description of the protocol that the employer will implement in order to procure the appropriate personal protective equipment for essential employees, based upon the various tasks and needs of such employees, in a quantity sufficient to provide personal protective equipment to each essential employee during any given work shift. Such description shall also include a plan for storage of such equipment to prevent degradation and permit immediate access in the event of an emergency declaration.
- A description of the protocol in the event an employee is exposed to a known case of the communicable disease that is the subject of the state disaster emergency, exhibits symptoms of such disease, or tests positive for such disease in order to prevent the spread or contraction of such disease in the workplace. Such protocol shall also detail actions to be taken to immediately and thoroughly disinfect the work area of any employee known or suspected to be infected with the communicable disease as well as any common area surface and shared equipment such employee may have touched, and the employer policy on available leave in the event of the need of an employee to receive testing, treatment, isolation, or quarantine. Such protocol shall not involve any action that would violate any existing federal, state, or local law, including regarding sick leave or health information privacy.
- A protocol for documenting hours and work locations, including off-site visits, for essential employees. Such protocol shall be designed only to aid in tracking of the disease and to identify the population of exposed employees in order to facilitate the provision of any benefits which may be available to certain employees on that basis.
- A protocol for how the public employer will work with such employer's locality to identify sites for emergency housing for essential employees in order to further contain the spread of the communicable disease that is the subject of the declared emergency, to the extent applicable to the needs of the workplace.
- Any other public health requirements determined by the New York State Department of Health (DOH) that are designed to reduce transmission of infectious diseases, such as face coverings, contact tracing, diagnostic testing, social distancing, hand and respiratory hygiene, and cleaning and disinfection protocols.

NOTE: The NFTA is available to continue discussions about this disaster emergency plan in labor-management meetings.

A. Essential Personnel

The following positions are considered essential personnel. Essential personnel are defined as those employees who must be physically present at their worksite in order to perform the duties required of their position. This list may change at any time at the discretion of NFTA Management.



Niagara Frontier Transportation Authority CONTINUITY OF OPERATIONS PLAN FOR A STATE DISASTER EMERGENCY INVOLVING A COMMUNICABLE DISEASE

- ARFF
- Transit Police
- Metro Mechanics
- Metro Custodial
- Operators
- Metro Operations Supervision
- Metro Support Staff
- BNIA & NFIA Airfield Operations
- Airfield Supervision and Airport Terminal Supervision
- Custodial
- FMD
- NFTA Support Staff

B. Telecommuting

For those employees considered non-essential and have the ability to work remotely, the Authority shall establish protocol to allow for such employees to work via authority issued laptops or workstations. Authorization for remote work shall come from the Executive Director based on the Governor's guidance or requirements:

- Protocol for telecommuting:
 - As a result of the COVID-19 pandemic, the Governor's Office of Employee Relations (GOER) has established a Statewide, uniform, pilot telecommuting program which outlines how agencies/authorities manage telecommuting. In the event of a future state disaster emergency involving a communicable disease, the agency/authority will receive direction from GOER on the rules and guidelines applicable to telecommuting but will take these steps in order to implement and operationalize any telecommuting program, where applicable, for the agency/authority.
 - NFTA will periodically assess its technology needs for telecommuting and work with ITS to ensure that appropriate information technology resources are available.
- Protocol for procurement, distribution, downloading and installation of needed technology; and
 - Upgrade Firewalls to the latest revision and verified that they are automatically applying dynamic updates for threat protection.
 - Remote user access is locked down to only the systems they need to do their job.
 - Enable remote work using two methods.
 - Virtual Private Network (VPN) - Employees with company laptops are using a VPN connection to securely connect to our network. Once connected the laptops are patched with operating systems patches and endpoint protection updates regularly.
 - LogMeIn (LMI) - This method allows users to use their home machines to securely connect to their work machine. This connection is a screen redirection only that allows the user to work while all data remains with the Authority's protection zone.



Niagara Frontier Transportation Authority

CONTINUITY OF OPERATIONS PLAN FOR A STATE DISASTER EMERGENCY INVOLVING A COMMUNICABLE DISEASE

- Installed a separate firewall that allows users to take their office phone home and use it as if it were on their desk at work. This allows for internal communications to remain internal as an encrypted connection.
- Changed our patch scanning routine to daily as an added protection for all the remote work.
- Protocol for phone coverage and transfer of office phone lines to work or personal cell phones. The NFTA's phone system allows for the following:
 - The transfer of calls to an employee's office to be redirected to their cell phone or other allocated phone line.
 - The transfer of voicemails left on an employee's office phone to be sent as an email message to the recipient.

C. Work Shifts/Schedules

In order to reduce overcrowding on public transportation systems and at worksites the following considerations have been/will be made.

- Employees considered to be non-essential shall be allowed to work from a remote location.
- Currently most of the essential employee work groups report to work at staggered start times or different shifts allowing for the separation of those employees.
- Meetings normally held on-site can be held virtually to allow for employees to maintain separation between employees, contractors, vendors, etc.
- Where employees must have close interaction, such as working on a similar piece of equipment, those employees shall be required to wear the appropriate PPE in order to prevent the spread of disease.

D. Personal Protective Equipment

Typically, Health Emergency related pandemics result in significant challenges on supply chains all over the world due to increased demand for personal protective equipment (PPE) and resulting shortages and price increases. At the NFTA, our major emphasis is to acquire the necessary PPE to protect our employees, especially those on the front-line, while maintaining operations to support our local community. Our supply chain flexibility has guaranteed the NFTA's ability to have necessary supplies on hand to accommodate both our employees and in some cases our customers.

Our success is always based on hard work and dedication from our employees. In order to continue safe and effective service, the NFTA plans to implement or continue the practice of the following initiatives and procedure changes to maintain the appropriate inventory levels for gloves, masks, cleaners, disinfectants, and other PPE.

Established Best Practices to Continue During an Event:

- Established a weekly conference call between Supply Chain and HSEQ to review inventory levels of PPE, discuss usage, and create plans to distribute the necessary PPE to employees.



Niagara Frontier Transportation Authority

CONTINUITY OF OPERATIONS PLAN FOR A STATE DISASTER EMERGENCY INVOLVING A COMMUNICABLE DISEASE

- PPE inventory storage shall take place within the Central Storeroom at the Cold Spring Facility with established equipment shelf life. This will allow for all PPE to be stored and managed in an indoor, temperature regulated facility.
- Training on the proper use of PPE will take place during the employee's annual safety training.
- Most PPE used by NFTA employees is considered disposable and will be thrown out into waste facilities after use. Reusable PPE such as face shields or uniforms shall be properly disinfected or laundered after each use.
- Employee will be provided training on proper donning, doffing cleaning and disposal of PPE.
- Signage reminding employees of proper PPE use are posted throughout NFTA facilities.
- Partnered with strategic vendors to communicate supply needs, ensure timely deliveries, and identify changes in the markets. By working with strategic vendors, we have procured goods at fair and reasonable prices.

In terms of our PPE supply reserves, the following inventory goals have been established:

- Hand sanitizer - 26-week supply
- N95/KN95 masks - 26-week supply
- Disposable face masks - 10-week supply
- Reusable face masks - 3 per employee
- Bleach/disinfectants - 26-week supply
- Sanitizing wipes - 20-week supply
- Nitrile gloves - 26-week supply
- No touch thermometers - 50-unit supply

E. Exposure Protocol

In order to prevent the spread of the communicable disease throughout any employee's workplace, procedures shall be put in place to help contain the disease and eliminate potential exposures. The following shall take place in the event of an employee exposure to a known case of the communicable disease:

- The employee shall be removed from their work location and sent home for evaluation or shall be advised to stay home if they have not yet reported to work.
- The employee shall contact the Human Resources Department to report the exposure or symptoms to them.
- Upon confirmation of a positive case the Human Resources Department shall contact the appropriate agencies including the New York State Department of Health, Erie County Health Department and the Governor's Office to report the positive case.
- The Human Resources Department shall contact the employee's supervisor and any potentially affected employees to begin workplace contact tracing to determine any other possible exposures that may have occurred in the workplace. Methods to make this determination may include, job assignments, visual observations, video review, adherence to mask or other critical PPE requirements.



Niagara Frontier Transportation Authority CONTINUITY OF OPERATIONS PLAN FOR A STATE DISASTER EMERGENCY INVOLVING A COMMUNICABLE DISEASE

- If they employee was sent home from work, the employee's work area, common area surfaces, and shared equipment that they may have come in contact with shall be immediately disinfected by NFTA staff or approved contractor.
 - Further, the NFTA shall abide by all additional directives from the Director of State Operations and Infrastructure memorandum, entitled, "[Employee Testing and Evaluation Protocols for COVID-19](#)", which includes cleaning and disinfecting protocols, as well as notification to health officials and potential employee contacts.
- The NFTA will utilize engineering controls, safe work practices and PPE in order to minimize exposure in a future state disaster emergency caused by a communicable disease which will be dependent on the communicable disease that causes such disaster emergency.
- The NFTA will provide periodic updates, as information becomes available, on the communicable disease and its transmission as part of its exposure protocols in order to assist with reducing transmission.

The following are routine procedures that shall be put in place to further control the potential of employees reporting to the workplace while carrying the communicable disease:

- Implement mandatory daily health screening for contact or symptoms (e.g., questionnaire, temperature check) for in-person employees at or near the beginning of each workday.
- Coordinate screening to prevent employees from intermingling in close contact with each other prior to completion of the screening.
- Ensure agency/authority is following all screening, testing, and tracing procedures as outlined in the applicable DOH guidance, including instructions to employees on when to return home and when to return to work.
- Ensure screening staff are trained supervisory-level employees or health care professionals, wearing appropriate personal protective equipment including at least a face covering and gloves, if the screening involves contact.
- Maintain a record of all staff who are screened, as well as if screening was passed or if the staff member was instructed to return home, provided no other health information is recorded or maintained. Record must be reviewed and secured on a daily basis.
- Facility Supervisors shall be responsible for continuous employee compliance with all aspects of the site safety plan.
- Maintain a log of every person reporting to NFTA facilities, including employees and visitors, who may have close contact with other individuals at the worksite or area, excluding deliveries that are performed with appropriate PPE or through contactless means.

The NFTA's leave policy in the event an employee must receive testing, treatment, isolation, or quarantine:

- While the amount and types of leave available to an employee will be dependent on the particular disaster emergency that has been declared and any provisions of law that provide for leave under such circumstances, during the COVID-19 pandemic an employee's leave options included GOER quarantine leave, other applicable State policy, leave provided under the Families First Coronavirus Response Act and an employee's own leave accruals. Policy on available leaves will be established by the Department of Civil Service and/or GOER who shall provide guidance to the agencies/authorities on how to instruct employees about available leaves.



Niagara Frontier Transportation Authority **CONTINUITY OF OPERATIONS PLAN FOR A STATE DISASTER** **EMERGENCY INVOLVING A COMMUNICABLE DISEASE**

F. Protocol for Documenting Work Hours/Locations

Protocol for documenting hours and work locations, including off-site visits, for essential employees shall be established during a health emergency declaration. The protocol shall be designed to aid in the tracking of the disease and to identify the population of potentially exposed employees. The process will facilitate the provision of any benefits which may be available to certain employees on that basis.

- Employees shall be required to sign in on a log housed at each location upon entering any facility including their normal work location or other authority location.
- The facility Supervisor or Manager shall be responsible for ensuring all employees and visitors sign in upon entry to their facility.
- The logs shall be provided by and returned to the Health, Safety, and Environmental Quality Department upon completion of the designated time period (calendar days as listed on log).
- The logs will be kept in scanned and stored in both paper and electronic form and will be provided to the Human Resources Department upon request.

G. Protocol for Identifying Emergency Housing for Essential Employees

To the extent needed, the operations management of the locations will be the point of contact for the identification of emergency housing for essential employees. Working with Human Resources, the Ops Managers will be responsible for contacting county and local elected officials, owners/operators of local hotels and similar establishments, and local college and university officials (both public and private) to develop information about the local availability of emergency housing for essential employees.

Emergency housing opportunities, once developed, will be communicated to employees who may be in need of such housing.

- The Authority shall work with the Erie County Department of Emergency Services and local hotels to establish an Emergency Housing Location as needed.

H. Other Requirements Determined by the NYS DOH

Current DOH guidelines for COVID-19 are as follows and will be modified depending on the particular emergency declared.

- Ensure a distance of at least 6 feet is always maintained among employees, unless safety of the core activity requires a shorter distance (e.g., moving and lifting equipment). Any time an employee must come within 6 feet of another person, the employee and person should wear acceptable face coverings.
- When distancing is not feasible between workstations or areas, provide and require the use of face coverings or erect physical barriers, such as plastic shielding walls, in lieu of face coverings in areas where they would not affect air flow, heating, cooling, or ventilation.
- Tightly confined spaces should be occupied by only one individual at a time, unless all occupants are wearing face coverings. If occupied by more than one person, occupancy will be kept under 50% of maximum capacity.



Niagara Frontier Transportation Authority

CONTINUITY OF OPERATIONS PLAN FOR A STATE DISASTER EMERGENCY INVOLVING A COMMUNICABLE DISEASE

- Social distancing markers should be posted around the workplace using tape or signs that indicate 6 feet of spacing in commonly used areas and any areas in which lines are commonly formed or people may congregate (e.g., clock in/out stations, health screening stations, break rooms, water coolers, etc.). Further, bi-directional foot traffic should be reduced by using tape or signs with arrows in narrow aisles, hallways or spaces.
- Post signs, consistent with the DOH COVID-19 signage, to remind employees about social distancing, hand hygiene, PPE, and cleaning guidelines.
- Limit employee travel for work to only essential travel.
- Hygiene and sanitation requirements from the Centers for Disease Control and Prevention (CDC) and DOH must be followed, and cleaning logs that include the date, time, and scope of cleaning must be maintained.
- Hand hygiene stations, including handwashing with soap, water, and disposable paper towels, as well as NYS Clean hand sanitizer or a hand sanitizer containing 60% or more alcohol for areas where handwashing facilities may not be available or practical, must be provided and maintained for personnel.
- Appropriate cleaning/disinfection supplies for shared and frequently touched surfaces must be provided, and employees must use these supplies before and after use of these surfaces, followed by hand hygiene.
- Regular cleaning and disinfection of the office location must be undertaken. More frequent cleaning and disinfection must be undertaken for high-risk areas used by many individuals and for frequently touched surfaces, at least after each shift, daily, or more frequently as needed, and align with DOH's "Interim Guidance for Cleaning and Disinfection of Public and Private Facilities for COVID-19".
- Exposed areas must be cleaned and disinfected in the event of an employee testing positive for COVID-19. Such cleaning should include, at a minimum, all heavy transit areas and high-touch surfaces (e.g., vending machines, handrails, bathrooms, doorknobs, etc.).
- CDC guidelines on "Cleaning and Disinfecting Your Facility" should be complied with if someone in your facility is suspected or confirmed to have COVID-19.
- Agencies/authorities must have internally identified key points of contact including but not limited to site safety monitors, individuals responsible for monitoring compliance with this plan and central points of contact who will coordinate efforts to notify appropriate health authorities of positive cases and assist with required contact tracing.
- NFTA will also comply with all executive orders and emergency regulations related to the state disaster emergency and additional will honor all applicable provisions of any applicable bargaining agreements and any applicable federal law, rule or regulation.