



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 contact.

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 the publication of this document, while the State continues to deal with COVID-19 and a risk still exists, no designation is in effect at this time. Please check the websites of Departments of Health and Labor for up to date information on whether a designation has been put into effect, as any such designation will be prominently displayed. No employer is required to put a plan into effect absent such a designation by the Commissioner of Health.

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I. RESPONSIBILITIES

This plan applies to all employees of Pyramid Management Group LLC , and [all]/[the following work sites]:

See Appendix 1

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
See Appendix 2			

II. EXPOSURE CONTROLS DURING A DESIGNATED OUTBREAK

A. MINIMUM CONTROLS DURING AN OUTBREAK

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

- 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, gloves, 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.
- “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 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.
- Health Screening:** Employees will be screened for symptoms of the infectious disease at the beginning of their shift. Employees are to self-monitor throughout their shift 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 will 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. have features could get caught in machinery or cause severe fogging of eyewear. The face coverings must be kept clean and sanitary and changed when soiled, contaminated, or damaged. **See Appendix 3 for CDC requirements for masks. NY state mask mandate lifted 2/10/2022.**
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: (Note to employer: Check off the controls you intend to use and add any additional controls not listed here.)

- restricting or limiting customer or visitor entry;
- limiting occupancy;
- allowing only one person at a time inside small enclosed spaces with poor ventilation;
- reconfiguring workspaces;
- physical barriers;
- signage;
- floor markings;
- telecommuting;
- remote meetings;
- preventing gatherings;
- restricting travel;
- creating new work shifts and/or staggering work hours;
- adjusting break times and lunch periods;
- delivering services remotely or through curbside pickup;
- _____
- _____
- _____

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 HR department 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, additional controls from the following hierarchy may be necessary. Employers should determine if the following are necessary:

1. Elimination: Employers should consider the temporary suspension or elimination of risky activities where adequate controls could not provide sufficient protection for employees.
2. Engineering Controls: Employers should consider appropriate controls to contain and/or remove the infectious agent, prevent the agent from being spread, or isolate the worker from the infectious agent. Examples of engineering controls include:
 - a. General Ventilation, for example:
 - Increasing the percentage of fresh air introduced into air handling systems;
 - Avoiding air recirculation;
 - Using higher-efficiency air filters in the air handling system;
 - b. Install cleanable barriers such as partitions and/or clear plastic sneeze/cough guards.
 - c. Change layout to avoid points or areas where employees may congregate (e.g., install additional timeclocks).

Subject to changes based on operations and circumstances surrounding the infectious disease, engineering controls that are anticipated to be used are listed in the following table:

Engineering Controls Utilized/Location:
Increase filtration to MERV 11.
Increase ventilation via HVAC fan motors.

Note to Employer: One of the best ways to reduce exposure to infectious agents is to improve ventilation. The aim is to deliver more “clean air” into an occupied area and exhaust the contaminated air to a safe location. In some cases, the air may have to be filtered before it enters the work area and/or before it is exhausted. Direct the contaminated air away from other individuals and from the building’s fresh air intake ports. Consult your ventilation system’s manufacturer or service company to determine if improvements are possible for your system.

3. “Administrative Controls” are policies and work rules used to prevent exposure. Examples include:

- Increasing the space between workers;
- Establishing pods or cohorts working on same shift;
- Disinfecting procedures for specific operations;
- Provide additional short breaks for handwashing and cleaning;
- 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;

Subject to changes based on operations and circumstances surrounding the infectious disease, the following specific administrative controls are anticipated to be used:

Administrative Controls Utilized/Location:
<ul style="list-style-type: none"> -Increased space between workers -Ongoing employee training
<ul style="list-style-type: none"> -Posting signs to remind employees of all precautionary requirements which have been implemented.
<ul style="list-style-type: none"> - The enforcement responsibilities in the centers will be shared by the General Managers, the Operations Managers, and the Office Managers. An email will be sent to let the centers know these enforcement responsibilities are in place. -The enforcement responsibilities at Home Office will be shared by Cindy Rogan and Paul Wehrle.

4. 10. Personal Protective Equipment (PPE) are devices like eye protection, face shields, respirators , , and gloves that protect the wearer from infection. PPE 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:
<ul style="list-style-type: none"> -Face masks, gloves and training provided to ensure proper use.

1 The use of respiratory protection, e.g. an N95 filtering facepiece respirator, requires compliance with the OSHA Respiratory Protection Standard 29 CFR 1910.134 or temporary respiratory protection requirements OSHA allows for during the infectious disease outbreak.

2 Respirators with exhalation valves will release exhaled droplets from the respirators. Respirators are designed to protect the wearer. Surgical masks and face coverings, which are not respirators, are designed to protect others, not the wearer.

C. EXPOSURE CONTROL READINESS, MAINTENANCE AND STORAGE:

The controls we have selected will be obtained, properly stored, and maintained so that they are ready for immediate use in the event of an infectious disease outbreak and any applicable expiration dates will be properly considered.

III. HOUSEKEEPING DURING A DESIGNATED OUTBREAK

A. Disinfection Methods and Schedules

Objects that are touched repeatedly by multiple individuals, such as door handles, light switches, control buttons/levers, dials, levers, 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.

The disinfection methods and schedules selected are based on specific workplace conditions.

The New York State Department of Environmental Conservation (NYSDEC) and the Environmental Protection Agency (EPA) have compiled lists of approved disinfectants that are effective against many infectious agents (see dec.ny.gov and epa.gov/pesticide-registration/selected-epa-registered-disinfectants). Select disinfectants based on NYSDOH and CDC guidance and follow manufacturer guidance for methods, dilution, use, and contact time.

B. Adjustments to Normal Housekeeping Procedures

Normal housekeeping duties and schedules should continue to be followed during an infectious disease outbreak, to the extent practicable and appropriate consistent with NYSDOH and/or CDC guidance in effect at the time. However, routine procedures may need to be adjusted and additional cleaning and disinfecting may be required.

Housekeeping staff may be at increased risk because they may be cleaning many potentially contaminated surfaces. Some housekeeping activities, like dry sweeping, vacuuming, and dusting, can resuspend into the air particles that are contaminated with the infectious agent. For that reason, alternative methods and/or increased levels of protection may be needed.

Rather than dusting, for example, the CDC recommends cleaning surfaces with soap and water before disinfecting them. Conducting housekeeping during “off” hours may also reduce other workers’ exposures to the infectious agent. Best practice dictates that housekeepers should wear respiratory protection. See cdc.gov for more guidance.

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 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

A. **PMG, HR and Operations team** _____ 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. (Note: training need not be provided to the following individuals: any individuals working for 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, where delivery or transport is conducted by an individual or entity that would otherwise be deemed an employer under this chapter)

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

1. The infectious agent and the disease(s) it can cause;
2. The signs and symptoms of the disease;
3. How the disease can be spread;
4. An explanation of this Exposure Prevention Plan;
5. The activities and locations at our worksite that may involve exposure to the infectious agent;
6. The use and limitations of exposure controls
7. A review of the standard, including employee rights provided under Labor Law, Section 218-B.

C. The training will be

1. 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);
2. Appropriate in content and vocabulary to your educational level, literacy, and preferred language; and
3. Verbally provided in person or through telephonic, electronic, or other means.

VI. PLAN EVALUATIONS DURING A DESIGNATED OUTBREAK

The employer 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. Document the plan revisions below:

Plan Revision History			
Date	Participants	Major Changes	Approved By
7/7/2021	Paul Wehrle/ Cindy Rogan	Guidance Received	
7/30/2021	Paul Wehrle/ Cindy Rogan	Compliant Plan Completed	
8/2/2021	Paul Wehrle/ Cindy Rogan	Compliant plan distributed to employees 8/2.	
9/8/2021	Paul Wehrle/ Cindy Rogan	HERO Act implemented 9/8/2021	
9/15/2021	All PMG Employees	Jessica Wojick from Marsh will conduct the training on COVID Exposure Plan	
10/6/2021	Paul Wehrle/ Cindy Rogan	HERO Act Extended until 10/31/2021 Appendix 3 added for mask requirements.	
11/1/2021	Paul Wehrle/Cindy Rogan	HERO Act Extended until 12/15/2021	
12/16/2021	Paul Wehrle/Cindy Rogan	HERO Act Extended until 1/15/2022	
1/17/2022	Paul Wehrle/Cindy Rogan	HERO Act Extended until 2/15/2022	
2/10/2022	Paul Wehrle/ Cindy Rogan	NY State mask mandate lifted 2/10/2022	
2/16/2022	Paul Wehrle/ Cindy Rogan	HERO Act Extended until 3/17/2022	
3/18/2022	Paul Wehrle/ Cindy Rogan	HERO Act Expired 3/18/2022	

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. Employer should include contact information to report violations of this plan and retaliation during regular business hours and for weekends/other non-regular business hours when employees may be working.

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Appendix 1

Pyramid Management Group work sites

1. Pyramid Management Group
101 North Clinton Street
Syracuse, NY 13202
2. Aviation Mall
578 Aviation Road
Queensbury, NY 12804
3. Champlain Centre
60 Smithfield Blvd
Plattsburgh, NY 12901
4. Crossgates Mall
One Crossgates Mall Road
Albany, NY 12203
5. Destiny USA
9090 Destiny USA Drive
Syracuse, NY 13204
6. Galleria at Crystal Run
One Galleria Drive Suite 142
Middletown, NY 10941
7. Hampshire Mall
367 Russell Street
Hadley, MA 01035
8. Holyoke Mall
50 Holyoke Street
Holyoke, MA 01040
9. Kingston Collection
101 Kingston Collection Way
Kingston, MA 02364
10. Palisades Center
1000 Palisades Center Drive
West Nyack, NY 10994
11. Poughkeepsie Galleria
2001 South Road
Poughkeepsie, NY 12601
12. Salmon Run Mall
21182 Salmon Run Mall Loop West
Watertown, NY 13601
13. Sangertown Square
8555 Seneca Turnpike
New Hartford, NY 13413
14. Walden Galleria
One Walden Galleria
Buffalo, NY 14225

Appendix 2

Pyramid Management Group Supervisory Employees:

Name	Title	Location	Phone
Cindy Rogan	Manager of Human Resources	Pyramid Management Group	315-634-7822
Paul Wehrle	Director of Corporate Operations	Pyramid Management Group	315-634-7821
Jason Tyler	Operations Director	Aviation Mall	518-793-8818
Russ Monty	Operations Director	Champlain Centre	518-561-8660
Tom Darby	Operations Director	Crossgates Mall	518-869-3522
Brandon Munger	Operations Director	Destiny USA	315-466-6000
Alan Kaplan	Operations Director	Galleria at Crystal Run	845-692-5757
Bill Mahoney	Operations Director	Hampshire Mall	413-586-5700
John Mastrangelo	Operations Director	Holyoke Mall	413-536-1441
Ian Van Doren	Operations Director	Kingston Collection	781-585-8900
John Urbanak	Operations Director	Palisades Center	845-348-1005
Kate Fakler	General Manager	Poughkeepsie Galleria	845-297-7600
Kirk Sykes	Operations Director	Salmon Run Mall	315-788-9210
Luke Condon	Operations Director	Sangertown Square	315-797-8520
Clay Hoffmann	Operations Director	Walden Galleria	716-681-7600
Teresa Hanley	Office Manager	Aviation Mall	518-793-8818
Carmen Sherwin	Office Manager	Champlain Centre	518-561-8660
Meghan Schoonover	Office Manager	Crossgates Mall	518-869-3522
Jeannie Dadd	Office Manager	Destiny USA	315-466-6000
Jeannette Watson	Office Manager	Galleria at Crystal Run	845-692-5757
Linda Roy	Office Manager	Hampshire Mall	413-586-5700
Kim Murphy-Rivera	Office Manager	Holyoke Mall	413-536-1441
Beth Tarantino	Office Manager	Kingston Collection	781-585-8900
Ogzena Dumeny	Office Manager	Palisades Center	845-348-1005
Eileen Evans	Office Manager	Poughkeepsie Galleria	845-297-7600
Rebecca Worthington	Office Manager	Salmon Run Mall	315-788-9210
Michele Engle	Office Manager	Sangertown Square	315-797-8520
Shelly Cronk	Office Manager	Walden Galleria	716-681-7600

Your masks must comply with the below information from the CDC. If your mask does not comply you can reach out to HR for a compliant mask.

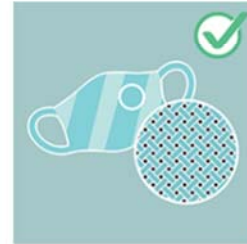
Masks

Cloth Masks

Cloth Masks can be made from a variety of fabrics and many types of cloth masks are available.

Wear cloth masks with

- A proper fit over your nose and mouth to prevent leaks
- Multiple layers of tightly woven, breathable fabric
- Nose wire
- Fabric that blocks light when held up to bright light source



Do NOT wear cloth masks with

- Gaps around the sides of the face or nose
- Exhalation valves, vents, or other openings (see example)
- Single-layer fabric or those made of thin fabric that don't block light

