



International Institute of New England

Return to Onsite Work Plan October 9, 2020

2 Boylston Street, 3rd Floor
Boston, MA 02116
(617) 695-9990

15 Warren Street, 2nd Floor
Lowell, MA 01852
(978) 459-9031

470 Pine Street, Lower Level
Manchester, NH 03104
(603) 647-1500

www.iine.org

COVID-19 Return-to-Onsite Work Plan

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IINE's greatest concern is for the safety and wellness of our staff, clients, and visitors. With this in mind, IINE has developed a phased return-to-onsite-work plan that includes protocols all IINE employees, clients and visitors must follow so that we can keep each other safe. The plan has been informed by feedback from staff meetings, a staff survey, and pandemic requirements of the Centers for Disease Control and the states of Massachusetts and New Hampshire.

All policies established herein are in effect as of Tuesday, October 13, 2020, when IINE anticipates permitting a limited number of staff to work onsite. The policies in this plan apply to all IINE employees, clients, contractors, and subtenants.

We ask employees to remain open and flexible as we start providing more services onsite. Information and best practices related to COVID-19 continue to change, and the Executive Leadership team will communicate modifications to this plan whenever it is necessary.

In the summer of 2020, IINE conducted a hazard assessment of each site that gave guidance on what improvements were needed to allow for a careful return to some in-person services. Based on this assessment, we are outfitting each site with enhanced safety equipment and supplies, including barrier and partition controls, personal protective equipment, signage¹, and cleaning materials.

Following state guidance, our architectural firm, DyerBrown, has examined our three locations and determined the maximum number of staff that can be in an office, conference room or other space at the same time, the number of students per classroom, where distance markers should be placed in passageways and open spaces, and other design features. Based on DyerBrown's analysis, the plan limits the number of people onsite at any time, and allows clients and visitors onsite by appointment only.

While we are taking many precautions, the success of a modified return to onsite work plan requires each employee to act responsibly and to follow internal protocols.

This Return-to-Onsite Work plan does not contain an exhaustive list of policies and expectations in the workplace. All other previously established IINE policies continue to apply and guide our work.

Information included within this plan will be updated as needed. IINE will communicate changes in a timely manner, and an updated copy of this document can be found here: <https://team.iine.org>.

¹ To see required postings, please visit: <https://www.mass.gov/info-details/reopening-mandatory-safety-standards-for-workplaces#poster-and-translations-> and <https://www.mass.gov/doc/compliance-attestation-poster-english/download>.

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COVID-19

Coronavirus 2019 (COVID-19) is a viral contagion that first appeared in the United States in early 2020. The federal government, including the Center for Disease Control (CDC), and each individual state and municipality, regularly share updated information related to the virus and its spread with the public. Government authorities at all levels have put in place policies and regulations meant to protect individuals and the public.

Since COVID-19 is a respiratory virus, many of the preventative measures and best practices enacted seek to limit person-to-person contact. As an organization with a responsibility to keep clients and staff safe, IINE is committed to adhering to all regulations relevant to containing the virus.

Symptoms of COVID-19

Per the CDC², individuals infected by COVID-19 may display any of the following common symptoms within 14 days of exposure:

- Fever (100.0 and above) or chills
- Cough
- Shortness of breath or difficulty breathing
- Fatigue
- Muscle or body aches
- Headache
- New loss of taste or smell
- Sore throat
- Congestion or runny nose
- Nausea or vomiting
- Diarrhea

This Return to Onsite Work Plan contains detailed steps, based on CDC recommendations³, that employees are strongly requested to take in the event they or a member of their household have these symptoms. If at any time you experience a COVID-19 like symptom, IINE strongly encourages you to speak with a medical professional, contact your supervisor, and contact the Director of Human Resources and Operations. The contact information for the Director of Human Resources and Operations can be found in the “Important Contacts” section of this policy. Additionally, as you’ll see later in the plan, IINE staff must refrain from conducting any work in the field on behalf of IINE or visiting any IINE office.

²<https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>

³ Please see <https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/steps-when-sick.html>

Summary of Critical Protocols

The ensuing pages include more details about each policy. This section gives employees a summary of the most important steps they need to take to keep themselves, colleagues, and clients safe.

Log of Staff, Clients and Visitors at IINE each day

IINE, like all employers, must maintain a log of workers and visitors who enter an IINE site each day to support contract tracing, if needed. We maintain a log by requiring each employee and visitor to complete an online pre-screening form. In addition, a front desk receptionist or other employee maintains a log of visitors and clients to each office each day. IINE is obligated to notify the local Board of Health if we become aware of a positive case at the workplace and to follow local contact tracing procedures.

Before Coming to Work

Staff must have permission from their supervisor in order to be able to come to work.

All staff must complete the COVID-19 screening form before coming to the office. You can view the form here: <https://team.iine.org/covid-19-screening/>. In addition, you can stay up-to-date on COVID-19 issues by visiting <https://team.iine.org/>. You have to complete the screening form within three hours prior to your arrival in an IINE office. If you answer “Yes” to any question, you may not come to work and must contact your supervisor.

At Work

While at work, employees must:

- Wear masks, with limited exceptions, and must keep a distance of six feet or more from other staff, clients, and visitors.
- Wash hands frequently and keep work areas clean.
- Follow the protocols in place in each building where we have an office, such as the number of people in an elevator.
- Follow posted instructions in each IINE office.
- Ensure that clients you meet with, either in or outside of the office, complete the COVID-19 pre-screening form on the IINE website: <https://iine.org/covid-19-pre-screening-for-visitors/>.
- Remind visitors or clients they are hosting to wear a mask and practice social distancing.
- Require non-client visitors such as donors to complete the pre-screening form.

What happens if there is a case of COVID-19 at IINE?

In the event that IINE learns of a diagnosis of COVID-19 of a client or visitor who has interacted with one or more IINE employees, or of a COVID-19 diagnosis of an IINE employee, IINE will investigate any contacts the infected individual(s) may have had with other IINE community members by reviewing the daily log in the office in question and speaking with employees, clients and visitors who may have had contact with the person who contracted COVID-19. IINE will consult with the local Board of Health of the office where the case occurred on appropriate steps to take to facilitate contact tracing.

Employees who may be impacted will be required to provide information to their supervisor regarding all of their work activities during the period in question and any individuals with whom they have had contact. IINE will inform staff of the case, and IINE will protect the privacy of all of those involved. The CDC and the state of Massachusetts define close contact as anyone who was within six

feet of the infected individual for 15 minutes or longer, starting from two days before illness onset (or, for asymptomatic patients, 2 days prior to positive specimen collection) until the time the patient is isolated. The Managing Director of the site where the case is reported, Office Manager, and Director of Human Resources and Operations will be responsible for evaluating the circumstances surrounding the case and will make appropriate recommendations to the President and CEO.

Based on the facts of each case, IINE will take steps to protect the safety of clients, visitors, and staff. These steps may include an electrostatic cleaning and closure of the site for a period of time. Depending on the analysis of IINE's log of individuals in the office on the day(s) and time(s) in question, some staff may have to quarantine and/or not return to work until they have a negative COVID-19 test.

The President and CEO will make the final decision on whether to close a site and for how long, and will determine whether some or all staff are prohibited for returning to the site for a period of time.

Outside of Work

Employees are strongly encouraged to act responsibly outside of the office, including social distancing, mask wearing, refraining from large gatherings, and abiding by state laws, regulations, and expectations.

Any employee who tests positive for COVID-19 or who has had close contact with someone who has COVID-19 must immediately communicate this information to their supervisor and/or Director of Human Resources and Operations.

Site Safety

IINE Management is responsible for ensuring that all offices are professionally cleaned each day. IINE will supply cleaning supplies so that staff can clean their desks and work areas at the start and end of each day. Additionally, IINE will provide each employee with hand sanitizer.

Masks

IINE will provide masks to clients who come on site. Staff are expected to wear their own mask to work. According to the guidelines of the state of Massachusetts, face coverings should:

1. Cover the nose and mouth
2. Fit snugly but comfortably against the side of the face
3. Be secured with ties or ear loops
4. Include multiple layers of fabric
5. Allow for breathing without restriction
6. Be able to be laundered and machine dried without damage or change to shape

The states of Massachusetts and New Hampshire have exemptions for people who cannot wear masks. If the exemption is for a medical condition that puts the staff member, client or visitor in a high-risk medical category, IINE will generally require that person to work from home or receive services remotely. Any staff who have an exemption from wearing a mask must meet with the Director of Human Resources and Operations who will determine how IINE can determine an appropriate accommodation.

Legal Guidance

IINE must adhere to guidelines and Executive Orders from the states of Massachusetts and New Hampshire. The summary below contains relevant regulations from both states in effect as of October 1, 2020. IINE's screening form for visitors and staff includes required questions from both states⁴.

An Essential Business

In both Massachusetts and New Hampshire, IINE operates as an essential business⁵. When guidance is issued by either state, IINE follows protocols indicating when and to what degree essential businesses can open for services. As an essential business, however, IINE must adhere to all guidelines for workplaces during COVID-19, including screening visitors, signage, appropriate protections, capacity limits, staff training, maintaining visitor logs, cooperating with contact tracing, and other protocols.

Massachusetts Mandatory Safety Standards for Workplaces⁶

The state of Massachusetts issued this protocol on July 24, 2020. The standards in the protocol apply to all workplaces and apply to all sectors and industries. The Office Protocol⁷ in Massachusetts requires each office to "monitor customer and worker entries and exits and limit occupancy at all times to the greater" of the following:

- 50% of the building's maximum permitted occupancy as documented in its occupancy permit on record with the municipal building department or other municipal record holder
 - Buildings for which no permitted occupancy limitation is on record may allow 10 persons (including staff) per 1,000 square feet of accessible space
 - In any case, no enclosed space within the facility may exceed occupancy of 10 persons per 1,000 square feet
 - All occupancy counts and calculations shall include customers, staff, and other workers
 - Businesses and other organizations may exceed this maximum occupancy level based on a demonstrated need for relief based on public health or public safety considerations or where strict compliance may interfere with the continued delivery of critical services
- Ensure separation of 6 feet or more between individuals unless this creates a safety hazard due to the nature of the work or the configuration of the workspace
 - Close or reconfigure worker common spaces and high density areas where workers are likely to congregate (e.g., break rooms, eating areas) to allow 6 feet of physical distancing; redesign work stations to ensure physical distancing (e.g., separate tables, use distance markers to assure spacing)
 - Cafeterias must practice physical distancing and appropriate hygiene measures and may allow indoor and /or outdoor seating according to Restaurant guidance
 - Physical partitions separating workstations must be installed for areas that cannot be spaced out. Physical partitions must be at least 6 feet in height
 - Establish directional hallways and passageways for foot traffic if possible, to minimize contact. Post clearly visible signage regarding these policies

⁴ Please see <https://iine.org/covid19-prescreening/>

⁵ For Massachusetts, please see <https://www.mass.gov/info-details/covid-19-essential-services>. For New Hampshire, please see <https://www.nheconomy.com/NHEconomy/media/NH-Economy/Exhibit-A-to-Emergency-Order-17.pdf>.

⁶ Please see <https://www.mass.gov/info-details/reopening-mandatory-safety-standards-for-workplaces>.

⁷ Please see <https://www.mass.gov/info-details/safety-standards-and-checklist-office-spaces>

- Limit visitors where feasible, and avoid congregation in common areas (e.g., lobbies)
- Mark rooms and hallways to indicate 6 feet separation
- Stagger work schedules and improve ventilation for enclosed spaces where possible (e.g., open doors and windows)
 - Limit meeting sizes, ensure 6 feet of social distancing, and encourage remote participation
 - Stagger lunch and break times, regulating maximum number of people in one place and ensuring at least 6 feet of physical distancing
- Minimize the use of confined spaces (e.g., elevators, control rooms, vehicles) by more than one individual at a time; all workers in such spaces at the same time are required to wear face coverings

In addition to requiring employers to maintain log of staff and visitors on site, including name, date, time, and contact information), IINE must screen all employees before they come to work. The policy⁸ requires IINE to ensure that each employee:

- Is not experiencing any symptoms such as fever (100 degrees and above) or chills, cough, shortness of breath, sore throat, fatigue, headache, muscle/body aches, runny nose/congestion, new loss of taste or smell, or nausea, vomiting or diarrhea,
- Has not had “close contact” with an individual diagnosed with COVID-19. “Close contact” means living in the same household as a person who has tested positive for COVID-19, caring for a person who has tested positive for COVID-19, being within 6 feet of a person who has tested positive for COVID-19 for 15 minutes or more, or coming in direct contact with secretions (e.g., sharing utensils, being coughed on) from a person who has tested positive for COVID-19, while that person was symptomatic
- Has not been asked to self-isolate or quarantine by their doctor or a local public health official

Employees must certify that they meet these criteria before coming to work and will be asked again upon arrival to verify that they meet the above criteria.

Massachusetts COVID-19 Travel Order⁹

Effective August 1, 2020, all visitors to Massachusetts and returning residents who do not meet an exemption must complete a travel form prior to arrival unless you are visiting from a lower-risk state as designated by the Department of Public Health, quarantine for 14 days, or produce a negative COVID-19 test results administered 72 hours prior to your arrival in the state.

The exemptions to this rule are:

- **Lower-risk State:** This includes individuals coming from a COVID-19 lower-risk state within the United States, as detailed below.
- **Transitory travel:** This includes people who are passing through Massachusetts and permits travelers to drive through the State or to connect to their airplane, bus or train, or to stop at a

⁸ Please see <https://www.mass.gov/doc/sector-specific-workplace-safety-standards-phase-iii-step-1-for-office-spaces-to-address-covid/download>.

⁹ Please see <https://www.mass.gov/info-details/covid-19-travel-order>

highway rest stop, but this exception extends only so long as is reasonably required for the traveler to complete their transit, make any necessary airplane, bus, or train connection, or make use of travel services such as at a highway rest stop.

- **Persons Commuting for Work or School:** People who regularly commute, at least weekly, outside of Massachusetts to a fixed place to attend school or work or any person who regularly commutes, at least weekly into Massachusetts to a fixed place to attend school or work; provided that in either case, this exception applies only to and from the person's residence and place of work or school. Workers or students who travel to any place that is not their home state for personal or leisure reasons cannot rely on this exemption.
- **Patients Seeking or Receiving Medical Treatment:** Patients who are traveling to Massachusetts to seek or receive specialized medical care from a physician located in the Commonwealth and persons accompanying and providing needed support to the patient.
- **Military Personnel:** Any person who is required to travel to Massachusetts at the order or directive of a Federal or State military authority.
- **Workers Providing Critical Infrastructure Services:** Workers who enter Massachusetts to perform critical infrastructure functions as specified in Version 3.1 of the listing published by the Federal Cybersecurity and Infrastructure Security Agency are exempt from quarantine while they are commuting to or from or while at work. For the first 14-days after arrival, when the worker is not at work or commuting to work they must quarantine.

New Hampshire Universal Guidelines¹⁰

On August 27, 2020, the state of New Hampshire updated its reopening guidance. The guidance is very similar to Massachusetts. One exception is that New Hampshire states that employers "should" take employee temperatures onsite with a no-touch thermometer each day upon the person's arrival, but if this is not possible, each employee/volunteer can take his or her own temperature. The NH temperature threshold is 100.4, slightly higher than Massachusetts.

Because of this provision, IINE will require all employees to take their temperature both at home when they complete the COVID-19 pre-screening form and when they enter the workplace.

IINE has decided that a temperature of 100 degrees or higher requires a person to stay home from work.

New Hampshire's travel restrictions¹¹ require employers to prohibit any employee from entering the workplace prior to the completion of a 14-day self-quarantine¹² upon entry or return to New Hampshire from any state outside of New England. The order exempts essential travel, which includes travel for personal safety, medical care, care of others, parental shared custody, for food, beverage or medication, or for work. For those who answer affirmatively, testing is not required unless the employee develops symptoms. The state's Department of Public Health (DPH) instructs employers to not permit any non-essential international or out-of-state domestic business travel.

¹⁰ Please see <https://www.covidguidance.nh.gov/sites/g/files/ehbemt381/files/files/inline-documents/guidance-universal.pdf>

¹¹ Please see <https://www.covidguidance.nh.gov/out-state-visitors>

¹² Please see <https://www.dhhs.nh.gov/dphs/cdcs/covid19/documents/self-quarantine-covid.pdf>

Phased Return-to-Onsite Work Plan

Planning Phase

The Planning Phase takes place from March 13, 2020 to October 12, 2020. In this phase, a limited number of employees will work as needed from IINE offices. These employees include staff who need to come to the office to ensure that other employees can do their jobs and some program staff if a component of their work cannot be performed remotely and an on-site presence is required either to meet a contract's obligation or to provide appropriate services to an IINE client.

In addition, during this period, a limited number of clients may be permitted onsite for programming.

Phase 1 Considerations

Phase 1 – a period in which a limited amount of programming will take place on site – begins on October 13, 2020. We do not have a target date to end this phase and start Phase 2.

In Phase 1, employees who came to IINE offices during the Planning Phase will continue to work as needed from an IINE office. Each site will gradually reintroduce limited programs and services that strongly benefit from being conducted in-person. Services and meetings with clients are by appointment only.

Employees not participating in limited in-person services will continue to work remotely during this phase. Employees not scheduled for onsite work and seeking to access an IINE facility will require their Director's approval. Directors will have final say over who can be present at an IINE site.

Determining the number of staff and clients on site

IINE will adhere to Massachusetts space limits for all three of our offices; this means the sites must never reach 50% of their capacity. Our architectural firm, DyerBrown, has developed design plans for each site that limit the number of people in each office and classroom based on social distancing rules.

The Managing Director may determine that staff and clients are not able to safely social distance and may propose a different capacity limit than that set by the state and by the DyerBrown design plan. A revised plan that is contrary to the DyerBrown recommendations must be approved by the President and CEO. Additionally, at any given time, a Managing Director or her Office Manager may close a site for a temporary period of time to manage the flow and volume of people. This does not require approval of the President and CEO.

Finally, Managing Directors are encouraged to develop staggered schedules in which staff rotate the days they are in the office in order to limit staff and client contact.

As a general rule, IINE will not permit interns or volunteers to come to our sites unless approved by a member of the Executive Leadership Team responsible for the particular area of management served by the intern or volunteer (e.g., the Chief Program and Institutional Giving Officer will review requests from the Managing Directors, etc.). If volunteers and interns do come on site, they have to follow the same COVID-19 procedures that IINE employees are required to follow.

Site Safety

IINE has invested in Personal Protective Equipment (PPE), signage and other improvements to keep people safe. We have also reviewed ventilation in each site. To IINE's knowledge, there is no general consensus within the architectural, engineering, science and hygiene communities on specific heating, ventilation and air conditioning standards that must be adhered to in order to have proper ventilation in a room or building. There is general consensus, however, that COVID-19 is largely transmitted through the air, and that the greater the outside air ventilation rate, the more quickly airborne contaminants are removed from a space. Accordingly, IINE will take all reasonable precautions to ensure that ventilation in each site meets local and state building codes.

No amount of protections and signage, however, will replace good judgment: staff must not come to work if they do not feel well, and while onsite staff have to keep six feet from one another, wear masks, and wash their hands frequently.

Staff Arrival and Client Meeting Protocols

Staff Arrival at the office

Staff must complete the COVID-19 screening form (<https://team.iine.org/covid-19-screening/>) within three hours prior to their arrival at the office, and each staff member will be required to self-test their temperature each morning when they arrive in the office. Additionally, staff will be required to clean their desk, chairs, door knobs and other surfaces in their work area before they start the day. IINE will provide cleaning materials for you.

By-appointment client/visitor meeting protocol

Individual staff members are responsible for scheduling meetings with clients and visitors and for advising both that they may only come to the office when and if they have an appointment. Staff must get the permission of their supervisor prior to scheduling the appointment.

The site's Office Manager will monitor the meeting calendar and ensure the number of persons in an IINE office at any time does not exceed the limits specified.

Prior to arriving at any IINE office for a scheduled appointment, every client and visitor must complete the screening form, which can be found here: <https://iine.org/COVID-19-pre-screening-for-visitors/>. The form must be completed within three hours prior to the visit to the office, and staff should be prepared to help clients complete the screening form.

- If a staff member is meeting with a group or family, a COVID-19 screening form must be completed for each group/family member. Group members must wear masks, and the room cannot exceed posted occupancy limits.
- When a client or visitor arrives at an IINE office, the individual must wash their hands, put on an IINE-issued mask, and wait for a staff member to arrive.
- The Front Desk Receptionist or other IINE staff member coordinating the visit will ask the visitor or client if anything has changed in their health since they completed the screening form and note their name and this information in an online visitor log.
- Each visitor and client will be subject to an on-site temperature check when they arrive at an IINE office.

- The staff member hosting the client or visitor is responsible for checking the client's or visitor's temperature using the protocol in place where the meeting takes place. Face shields will be available for staff members to wear in addition to a mask if they choose.
- In the event that a client or visitor has not completed the screening form, the staff member hosting the client or visitor must either complete the form for them or help them to complete it before proceeding with a meeting.
- Masks will be worn by staff, clients, and visitors at all times. Every effort must be made to keep six feet of distance between staff members, clients and visitors.
- After completing an onsite meeting, the staff member will escort the client or visitor to the office exit.
- The staff member responsible for meeting with a client or visitor must disinfect all high touch surfaces in each meeting area (light switches, doorknobs, handrails, desks and chairs, and computer work stations) used by clients and visitors following an onsite visit.

Program services that may take place on site

Meetings between program staff and clients or visitors will continue to take place via video or phone call to the extent practicable and effective. Limited onsite services by appointment, with clients or visitors and staff having six feet of distance between them and masks being worn, will include:

- Client intakes (CS, TVAP, Employment and Education)
- Client assessments (Education and Skills Training)
- New client enrollments (CS, TVAP, Employment, Education and Skills Training)
- Resume creation (Employment)
- Advising (Education)
- Immigration Legal Services
- Other services approved by the site's Managing Director (e.g., Hiset services)

Community Services, Employment, and Education staff may only meet with clients on site by appointment and when a video or phone call is not the best way to provide services. Classes will continue to be delivered remotely, though we may pilot a program in Boston during this phase in which we live stream a class with some students learning in-person and other watching by video.

Immigration Legal Services staff are among those that have been working onsite during the Planning Phase (March 13 to October 12). They will continue this practice in order to complete paperwork, file cases, send mail, scan documents and receive payments from clients. The legal services staff will meet with most clients remotely. If the Managing Attorney determines that a meeting with a client must take in person, either for form preparation or to receive payment, she must inform the site Office Manager who will record the meeting in the site schedule and follow all protocols for client visits.

Meeting with clients and other stakeholders offsite

Before any in-person meeting with a client may take place, even if offsite, you must have permission from your supervisor. There must be a record of an email exchange between you and your supervisor authorizing the meeting with a client or other stakeholder. Some departments, including Immigration Legal Services, have blanket authority to meet with clients in person and do not specific instruction for each meeting, whether it is on- or offsite.

Each staff member meeting with the client must complete the pre-screening form and must make sure clients complete the form for visitors and clients. These forms are required even though the meeting is taking place offsite. During the meeting, IINE staff and clients must wear a mask and keep a distance of six feet. There may be circumstances when clients and staff are within six feet of one another. Staff are asked to keep these interactions to a minimum.

If a staff member determines that she or he cannot safely social distance in a meeting place, including a client's home, the staff member should not enter the home or meeting place. Clients include all clients currently in services, people coming to IINE staff to enroll in services, former clients who seek our assistance, and Suitcase Stories tellers.

The additional guidance below includes limited exceptions based on specific situation that have arisen since the start of COVID-19:

- During meetings between IINE attorneys and clients in USCIS offices, it is not unusual for the client and staff person to sit less than six feet apart from one another. Even though clients and attorneys must pass COVID-19 protocols in USCIS offices, both the client and staff member must complete IINE's screening forms. Additionally, the client and staff must conduct the meeting with their masks on.
- It is not necessary to have clients complete the pre-screening form for food pantry deliveries, unless the staff member anticipates entering the client's home.
- If you plan to visit with one client, you are required to get the client with whom you are meeting to complete the online questionnaire. An IINE staff member is only required to get additional family members to complete the form if the staff member anticipates meeting with more than one family member. Prior to visiting a family, the staff member must confirm that no one in the house has COVID-19, has been exposed to COVID-19, or has symptoms of COVID-19.

Client Expectations for Offsite Programming

While enrolled in an IINE program offsite with another provider such as a community college, IINE clients are expected to complete the screening form as if they were coming onsite for classes, and they must adhere to all protocols in place at the site of the training or other education program.

Phase 1 Timeline

Below is the planned timeline for Phase 1. It may change based on any new information we receive on the virus or conditions in our locations.

Staff Feedback

Between Friday, September 25, 2020 and October 8, 2020, IINE is surveying all staff, and we are sharing this draft Return to Onsite Work plan with all staff for review and comment. We invite staff to share their ideas and insights with their Directors and Supervisors, who will transmit their input to the Executive Leadership Team.

Reorientation Period

Between Tuesday, October 13 and Friday, October 23, 2020, any IINE staff member approved for onsite work will come to an IINE office for a minimum of two days to get used to and to practice all COVID-19 protocols. No client meetings may take place in an IINE office prior to Monday, October 26, 2020.

Each Office Manager will run through a checklist and protocol with you, and you must complete a form indicating that you have taken part in the orientation. For staff who work with clients, you will undergo a training on admitting clients to office, temperature testing, and protocols for onsite meetings.

First Day of Client Return

Our current target date is to allow a limited number of clients to come onsite, by appointment only, starting on **Monday, October 26, 2020**. This may change pending any new public health information and the pace of improvements in our sites. Some clients may come onsite prior to October 26, 2020 with permission of the President and CEO.

Phase 1 Site Occupancy Limits and Onsite Schedules

Each site has to adhere to the policies in this Return to Onsite Work plan. Below is a summary of the unique occupancy limits, program plans, and staffing schedules for each location.

Boston and Central Office Phase 1 Plan

This section details occupancy limits in Boston, both for central office and Boston program staff, as well as unique aspects of the Boston program and an initial schedule in Phase 1.

Boston On-Site Occupancy Limits
• Front Desk Reception – 3 visitors plus one front desk receptionist
• Each Vocational Training room - 6 seats (not including the teacher)
• Computer room - 8 seats (not including the teacher)
• Teacher’s room – 2 people
• Kitchen/Eating Area – 1 person (staff are not permitted to eat in this area)
• Client Meeting Room – 1 person
• Large conference – 4 people
• Medium conference – 2 people
• Enclosed offices – one staff member per office. The CEO and CFO’s offices are large enough to have two people in the office for a meeting, with both staff members wearing masks.
• Cubicles – every other cubicle may be occupied once additional sneeze guards are in place. Staff must wear masks in the cubicles unless they are eating or drinking.

Office Management: The office manager will be in the office Monday – Friday, 9:00-5:00 p.m.

Limiting staff and visitors to the Boston/Central Office

The Office Manager and Managing Director will monitor the number of staff and clients in the office. If either determines that visitors and staff cannot safely practice a social distance of six feet, they may limit the number of people on site for a period of time below the limits set by DyerBrown’s space plan.

Program Schedule

Limited onsite services unique to Boston include:

- The Education and Skills training team will finish their terms remotely. We will assess the availability of returning to in person classes in mid-October.
- ESOL: Term 1 ends October 29, 2020. Term 2 begins November 17, 2020
- Skills Training at 2 Boylston: TBD

- Skills Training Metro North: Term 2 begins September 29, 2020 and will be conducted remotely.
- UC program: Providing all services remotely, no in person or home visits are being scheduled at this time.
- Immigration Legal Services: The general protocol outlined above applies.
- Boston Food Pantry: Orders are placed and picked up monthly on Wednesdays. Those onsite Wednesdays will help unload and stock. One or two other staff members will be asked to support pick-up and delivery.

Preliminary Boston schedule to start Phase 1:

Staff Member	Monday	Tuesday	Wednesday	Thursday	Friday
Anca Moraru					
Dan Krichmar	9-5	9-5	9-5	9-5	9-5
Tom Roberts McMichael	9-5				9-5
Natalie Patalano	9-5		9-5		
Rahmatullah Aka		9-5		9-5	
Isa McCausland		9-5			
Tessa Lutz			9-5		

Preliminary Central Office Schedule to start Phase 1:

Staff Member	Monday	Tuesday	Wednesday	Thursday	Friday
Jeff Thielman	9-5	9-5	9-5	9-5	9-5
Rita McDonough	9-5		9-5		
Xan Weber	9-5	9-5		9-5	
Emma Tobin		9-5			
Maria Lauring			9-5		
Leona Breslow			9-5		
Jiayi Liu			9-5		
Shirley Cheng			9-5		
Sally Bunch					
Urška Klancik					
Theresa Okokon					
Kelly Brawn					
George Earley					

Lowell Office Phase 1 Plan

This section details occupancy limits in Lowell, unique aspects of the Lowell program, and an initial schedule in Phase 1.

Lowell On-Site Occupancy Limits
• Reception Area – 3 people
• Front Desk Reception – 1 person
• Classrooms 1 and 2 – 6 seats each
• Classroom 3 – 3 seats

• Resource Area Open Office (205) – 2 people
• Pantry – 1 person(staff must eat in their offices)
• Offices 205, 203, 201, 207, 211, 212, 218 – 1 person each
• Office 201 – 2 people
• Meeting Room – 2 people

Office Management: A part-time receptionist will be onsite twice a week.

Limiting staff and visitors to the Lowell Office

The Associate Director will monitor the number of staff and clients in the office. If the Associate Director determines that visitors and staff cannot safely practice a social distance of six feet, she may limit the number of people on site for a period of time below the limits set by DyerBrown’s space plan.

Staff meetings will continue to take place via remote video. If approved by the Associate Director, a client or visitor meeting will take place in a vocational trainings room with the client and staff member wearing masks and sitting at least six feet apart.

On arrival, Lowell clients will call the front desk to announce that they have arrived outside of the lobby door, which will stay locked. They will be invited in if they are wearing a mask. Visitors must complete the online questionnaire, and an IINE-Lowell staff member will perform a temperature check.

Program Schedule

Limited onsite services unique to Lowell include:

- Immigration Legal Services: Two staff members have been working regularly from the Lowell office during the planning phase and will continue to do so in Phase 1. Clients may come to the site as indicated above.
- Community Services: Community Services in person support will include the hand off of materials to U.S. ties, and meetings with new arrivals, and file documentation activities. One Community Services team member will be onsite once per week to process mail, scan documents, process deliveries, prepare for monitoring, prepare and organize deliveries, and perform other tasks. With an increase in arrivals, Community Services staff will need to set up apartments and distribute items to clients. The schedule below contains priority in-person tasks for the Community Services team by month, including seasonal priorities:

August	September	October	November
<ol style="list-style-type: none"> 1. Organize backpacks for distribution 2. Organize toiletry supplies for distribution 3. Set-up apartment and supplies for new arrival 	<ol style="list-style-type: none"> 1. Continue distribution of toiletry and supplies 2. Prepare for monitoring 3. Organize binders as needed 	<ol style="list-style-type: none"> 1. Begin collecting coats for the coat drive 2. Continue to prepare for monitoring 	<ol style="list-style-type: none"> 1. Organize distribution of coats for coat drive

4. Monitor PRM files and prepare for monitoring	4. Create binders for new arrivals.		
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- Employment Services: An Employment team member will be on-site a minimum of once per week in order to process, mail, scan documents, prepare for a monitoring visit, organize documentation, and perform other tasks.
- Education and Skills Training: All summer classes will be conducted remotely, including the current cycle of CNA training. An Education team member will be on site a minimum of once a week to check mail, complete intake documents (intake will be completed remotely, but documentation will happen at the office), and to distribute technology to students.
- Youth Services: The Youth Specialist will work in the office a minimum of once per week to organize files, mail, and print documentation. Client-facing activities will resume for the WIOA Youth program when the Associate Director approves a written plan for safe on-site group activities. Prior to coming on site, the Youth Specialist will send an email communication to all participants outlining the protocols they must follow prior to and during their visit to IINE-Lowell.

Preliminary Lowell Office Schedule to start Phase 1:

Staff Member	Monday	Tuesday	Wednesday	Thursday	Friday
Caroline Rowe	As needed				
Chiara St. Pierre	9-5		9-5	9-5	
Kate Bertino		9-5		9-5	9-5
Sherry Spaulding					
Sabyne Denaud		9-5			
Chris Ko	9-5		9-5		
Yusuf Abdi		9-5		9-5	
Michelle Davies					
Adam Musa					
Safeena Niazi			9-5		9-5
ESL Instructor					
Office Manager				9-5	

Manchester Office Phase 1 Plan

This section details occupancy limits in Manchester, unique aspects of the Manchester program, and an initial schedule in Phase 1.

Manchester On-Site Occupancy Limits
• Each Vocational Training Room is 4 seats (not including the teacher)
• Computer Room is 4 seats
• Teaching pantry – 2 people
• Staff pantry – 2 people

<ul style="list-style-type: none"> • Conference Room – 3 people
<ul style="list-style-type: none"> • Enclosed Offices – 1 person
<ul style="list-style-type: none"> • Cubicles – every other cubicle may be occupied once additional sneeze guards are in place. Staff in these spaces must wear masks unless they are eating or drinking.

Office Management: The Office Manager will be in the office 9-12 on Tuesdays and 9-12 on Fridays.

Limiting staff and visitors to the Manchester

The Office Manager and Managing Director will monitor the number of staff and clients in the office. If they determine that visitors and staff cannot safely practice a social distance of six feet, they may limit the number of people on site for a period of time below the limits set by DyerBrown’s space plan.

Program Schedule

Limited onsite services unique to Manchester include:

- Education and Workforce Development: This includes intakes and assessments, Post testing for current students, Literacy/Beginners packets preparation, Literacy/Beginners packets mailing, Goods distribution, Literacy instruction, Filing and paperwork administration, and record keeping/data management
- Community Services: limited in-person appointments when meeting by phone or video is ineffective, filing/paperwork, and goods distribution.
- Site Administration and Operations includes office mail, filing and paperwork administration, in-kind donations management, and meeting with Pinpoint interpreters if a video conference or phone call is not practical.

Preliminary Manchester Office Schedule to start Phase 1:

Staff Member	Monday	Tuesday	Wednesday	Thursday	Friday
Elsy Cipriani				9-12	
Emily Yadati		9-12			9-12
Megan Clark		9-12			
Jackson Efuta		9-12			
Sunita Pereira	1-5		9-12		
Kayla Rossmeissl			9-12		
Daniel Soucy				9-5	
Intern/Volunteer					9-12

Phase 2: To Be Determined

In this phase of IINE’s re-opening, most employees will return to work from an IINE office. IINE will expand the number of services provided in-person, looking to maximize the available space and resources to meet the needs of our clients. IINE will move to this phase once we receive clear guidance from state authorities. In addition, we will take into account our experience in Phase 1.

Some employees will continue to work remotely even during this phase. Interns and volunteers will need the Managing Director’s permission to visit or volunteer from IINE facilities during this phase. Each

office will continue to limit the number of employees and visitors allowed on site at any given time, and employees seeking to access an IINE facility will require their Director's approval.

Some or all IINE facilities may continue operating at a reduced schedule during Phase 2. Services and meetings are by appointment only; drop-ins will be allowed on certain days when staff are available.

Phase 3: To Be Determined

This is the final phase of IINE's reopening and will be dependent on guidance from the states of Massachusetts and New Hampshire. During this phase, IINE facilities return to regular hours, employees are able and expected to return to work without restriction, and interns and volunteers are allowed to resume all in-person commitments. Some safety protocols may continue as needed and required by the states of Massachusetts and New Hampshire.

Workplace Expectations

Communication

IINE Management will communicate with staff, within a reasonable amount of time, any information about a case of COVID-19 among a member of the IINE community, but IINE will not reveal the identity of any individual who is infected.

The decision to close an office or require staff to follow quarantine procedures because of a case of COVID-19 community will be made by the President and CEO with input from the Director of Human Resources and Operations, Managing Director, Office Manager and other informed staff.

Expectations for staff while working remotely

Most IINE staff have been working remotely since March of 2020. Here are some general rules that staff must adhere to while working remotely:

1. Speak with your supervisor about equipment and support you need to do your work remotely. If your home environment is not conducive all or some of the time to remote work, please speak with your supervisor to find a solution.
2. Your supervisor will work out a schedule with you. Generally, staff are required to be online and available for meetings, video and phone calls between 9:00 a.m. and 5:00 p.m., though the schedule may vary. During the work day, an employee is expected to respond to emails, phone calls, and meeting requests within a reasonable amount of time. Employees should keep their schedule updated so their supervisor knows their availability.
3. Failure to communicate and respond to supervisors and colleagues during the work day without reason may result in disciplinary action, up to and including termination.
4. Employees should treat virtual meetings with the same respect and decorum as in-person meetings.
5. Our quarterly evaluation system continues while employees are working remotely. Employees should discuss with their supervisor any special considerations about how time and performance should be measured while an employee is working remotely.

Conditions for in-person work

If given permission by your supervisor, anyone conducting business for IINE, whether at an IINE facility or in the field, must complete the screening form within three hours prior to arriving in the office. (E.g., if you are starting your day at 9:00 a.m., you have to complete the form between 6:00 a.m. and 9:00 a.m.). All employees will receive a text each day reminding them to do this.

Any employee who is unable to answer No to each question cannot come to the workplace and will need to work remotely. If the employee's job requires the employee to be at an IINE facility or in the field, every effort will be made to redeploy the staff member and replace him or her with another employee. In the event this is not possible, the employee will consult with the Director of Human Resources and Operations and may be required to use sick time, PTO, or another form of leave.

Any individual that begins experiencing symptoms while at an IINE facility, or in the field on IINE business, will be asked to isolate immediately. Visitors with COVID-like symptoms will be asked to leave an IINE facility immediately. If at an IINE facility, an employee should depart immediately and contact

their supervisor. If in the field, an employee should end their present activity and contact their IINE supervisor. If still able and willing to continuing working, employees may do so remotely.

If remote work is not possible, an employee will need to consult with the Director of Human Resource and Operations and may be required to use sick leave, PTO, or another form of leave.

Conditions for entry into an IINE office

Aside from completing entry requirements described above, employees will be expected to follow the policies and directions in this document as well as those communicated via signage at each office or communicated by email from a designated IINE official. Anyone who fails to meet the expectations stated below will be subject to disciplinary action, up to and including termination.

Employees are expected to follow Massachusetts and New Hampshire state regulations and policies, as applicable based on their residency and default office. Please note that travel restrictions enforced by each state may impact employee's ability to work in-person. Employees who are unable to perform required in-person duties because of travel must consult with the Director of Human Resources and Operations and may be expected to use sick time, PTO, or another form of leave. If all PTO is exhausted because an employee or a family member contracts COVID-19, please communicate with the Human Resources Office.

Cleaning and Disinfecting Offices and Work Areas

IINE offices are cleaned each day. In addition, IINE will provide cleaning supplies that staff are expected to use to keep their work areas clean. Every employee is required to clean their desk with cleaner provided by IINE upon arrival and prior to departure. Staff are asked to clean and disinfect public areas, such as classrooms, after they use them for visits or meetings with clients.

Commuting and Parking

During the Planning Phase and the start of Phase 1, IINE will reimburse employees for up to two days per week of non-public transit or parking costs related to an employee's work. This policy is meant to minimize the number of IINE staff using public transportation; we strongly encourage employees to take advantage of this benefit if and when they are on site. We will review this policy as more staff come on site.

Masks and Social Distancing at IINE offices

- Maintain at least six feet of distance between you and others.
- Masks must be worn whenever an IINE employee is not in a closed, personal office, eating a meal, or drinking a beverage on site. Otherwise, all employees have to wear masks at all times in IINE offices.
- Meetings between employees may only take place when each person present can be six feet from others.

When can an employee take a mask off at work?

There are limited exceptions for when employees may remove their masks at work. In each occasion, they must be sure they are at least six feet away from other people. The exceptions:

- To eat or drink food

- Filming for IINE events and promotional materials (one person may have the mask off, everyone in the room, including the film crew, must be wearing masks and be six feet or more from the person being filmed)
- While alone in an office with no other employees or visitors present

Practicing Good Hygiene

- Employees must wash their hands frequently while at work. This includes any time you arrive/leave the building, before and after using common spaces and equipment, before and after eating, after using the bathrooms, and whenever else it seems reasonable to do so.
- You should wash your hands with soap and water for at least 20 seconds, or use hand sanitizer.
- Avoid touching your eyes, nose, and mouth.
- Practice routine cleaning and disinfection of frequently touched objects and surfaces such as workstations, keyboards, telephones, handrails, and doorknobs. IINE will supply cleaning supplies for each office.
- Unless directed otherwise, employees must not share, loan, or borrow phones, desks, offices, or other personal work tools and equipment. Employees are expected to clean and disinfect personal equipment.

Using IINE spaces or equipment

IINE staff are expected to follow guidelines in each office for reserving rooms and must follow rules in each kitchen.

- Use larger rooms – classrooms and meeting rooms – for 1:1 or small group meetings. Observe occupancy limits. Do not use other employees’ space or equipment. When using shared equipment (printers, hole punches, paper cutters, shredders, etc.), be sure to clean your hands (with sanitizer or soap) before and after use.
- Common areas - Every study of the workplace is showing that the source of COVID-19 outbreaks at work are common areas where staff eat and talk. Staff must be vigilant about this, especially given the small size of our offices. Please plan your day such that you can eat at your desk or outside of the office. You’ll need to bring your own utensils.
- Water Fountains – traditional water fountains in which people sip water from a bubbler will be unavailable for use.
- Bathrooms – we are asking all staff to wash their hands frequently and maintain social distance.
- Kitchen rules – IINE must follow the latest guidance from Massachusetts with respect to common eating areas¹³:
 - One person at a time in the kitchen. Employees may not eat together in the kitchen.
 - Please clean microwaves after use.
 - Food should be stored in fridges for less than 24 hours. Office Managers will be strict in discarding food that remains for a longer period.
 - Dishes will not be allowed to remain in the sink or in drying racks.
 - No use of common dishware or utensils. Please bring your own.

¹³ Please see <https://www.mass.gov/doc/sector-specific-workplace-safety-standards-phase-iii-step-1-for-restaurants-to-address-covid-0/download>

- Staff may not eat in the kitchen area; they must take their food to their desk and eat there or eat outside of the office. If they work in a cubicle area, they must eat in an unoccupied office, conference room or other space.
- Staff may remove masks in their office or in a place where they are eating.
- Wash your hands before and after entering a kitchen.

IINE Protocol if an employee or visitor tests positive for COVID-19

The Managing Director of the site in question together with the Office Manager will inform the President and CEO and the Director of Human Resources and Operations immediately. The President and CEO will review the facts of the situation, consult with those involved, and may decide to close a site for a period of time.

The Managing Director and Office Manager, with assistance from the Director of Human Resources and Operations, will prepare a written report that includes information from the visitor logs on any day when an infected person may have been in an IINE office, including the names and contact information of all visitors, the times they were in the office, and any other relevant information.

The Managing Director and Office Manager may not reveal the name of the infected person to anyone other than the Director of Human Resources and Operations and the President/CEO.

Following a review of the all logs of visitors, clients and staff onsite during the period in question, the Managing Director, with support from the Director of Human Resources and Operations, will:

1. Contact each visitor, client and staff member in the office on the day(s) in question and let them know that they may have been exposed to someone who tested positive for COVID-19.
2. Notify all staff members and visitors who have had close contact with the staff member, client, or visitor who has COVID-19 that they may not come to an IINE office until they follow each of the steps outlined in the next section entitled “Protocol if an employee has symptoms of COVID-19.” The CDC defines close contact as anyone who was within six feet of the infected individual for 15 minutes or longer, starting from 2 days before illness onset (or, for asymptomatic patients, 2 days prior to positive specimen collection) until the time the patient is isolated.¹⁴ Massachusetts asks employers to adhere to this definition.
3. The Director of Human Resources and Operations will contact state authorities in Massachusetts and/or New Hampshire to begin contract tracing procedures. You can learn about the contact tracing process in Massachusetts by visiting this link: <https://www.mass.gov/info-details/learn-about-the-community-tracing-collaborative>. Here is a link to the protocol in New Hampshire: <https://www.dhhs.nh.gov/dphs/cdcs/covid19/documents/covid-case-investigation-plan.pdf>.
4. All IINE employees are required to cooperate with state agencies and/or the local Board of Health regarding contract tracing.
5. Visitors, including students and clients, must certify that they have cooperated with state and local authorities regarding contract tracing before being permitted to reenter an IINE office.
6. Prior to returning to work, employees must complete a return to work questionnaire.

¹⁴ Please see <https://www.cdc.gov/coronavirus/2019-ncov/php/contact-tracing/contact-tracing-plan/contact-tracing.html>

7. Failure to cooperate with this contract tracing regimen may result in disciplinary action, up to and including termination.

Protocol if an employee has symptoms of COVID-19

If you have any of the symptoms listed for COVID-19 on the employee questionnaire, or if you have been directed not to come to an IINE office because you may have been exposed to someone with COVID-19, you must do the following:

1. Stay home from work, but you may work remotely if you feel well enough to do so
2. Get a COVID-19 test
3. Refrain from coming to work while you are awaiting test results
4. If the test is positive, you have to quarantine for 14 days and have at least three days with no fever and improved symptoms without fever reducing medication
5. If the test is negative, you have to stay home until you are symptom-free for 24 hours without medication
6. If you decline to take a COVID-19 test, you must quarantine for 14 days from the onset of symptoms before returning to work

During a period in which you are prohibited from coming to an IINE office, you may continue to work remotely.

IINE strongly urges its employees to get a COVID-19 test at any time they believe they may have been exposed to someone with the illness.

Leave Options

In addition to their accrued sick time and PTO, as well as any other leave options outlined in IINE's personnel manual, employees have access to the following leave options. Please contact the Director of Human Resources and Operations to discuss your specific situation.

[Families First Coronavirus Response Act \(FFCRA\) Sick Time:](#)

The Families First Coronavirus Response Act (FFCRA or Act) requires certain employers to provide employees with paid sick leave or expanded family and medical leave for specified reasons related to COVID-19. The Department of Labor's (Department) Wage and Hour Division (WHD) administers and enforces the new law's paid leave requirements. These provisions will apply from the effective date through December 31, 2020.

[Family and Medical Leave Act](#)

The FMLA entitles eligible employees of covered employers to take unpaid, job-protected leave for specified family and medical reasons with continuation of group health insurance coverage under the same terms and conditions as if the employee had not taken leave. Eligible employees are entitled to:

- Twelve workweeks of leave in a 12-month period for:
 - the birth of a child and to care for the newborn child within one year of birth;
 - the placement with the employee of a child for adoption or foster care and to care for the newly placed child within one year of placement;
 - to care for the employee's spouse, child, or parent who has a serious health condition;
 - a serious health condition that makes the employee unable to perform the essential functions of his or her job;
 - any qualifying exigency arising out of the fact that the employee's spouse, son, daughter, or parent is a covered military member on "covered active duty;" **or**
- Twenty-six workweeks of leave during a single 12-month period to care for a covered service member with a serious injury or illness if the eligible employee is the service member's spouse, son, daughter, parent, or next of kin (military caregiver leave).

[Paid Family Medical Leave – MA only, Effective January 1, 2021:](#)

PFML stands for Paid Family Medical Leave. It is a state-offered benefit for anyone who works in Massachusetts and is eligible to take up to 26 weeks of paid leave for medical or family reasons. PFML is funded through a Massachusetts tax, and is separate from both the federally mandated benefits offered by the Family Medical Leave Act (FMLA) and from leave benefits that may be offered by your employer.

Important Contacts

In the event of a COVID-19 case or COVID-19 related situation that requires immediate attention, please contact:

Jeff Thielman

President & CEO

jthielman@iine.org

Direct Line: (617) 695-1669

Cell: (781) 859-9099

Maria Luring

Director of Human Resources & Operations

mluring@iine.org

Phone: (617) 695-0965

Acknowledgement Form

By signing below, I certify that I have read the COVID-19 Return-to-Onsite Work Plan, will adhere to all policies regarding health checks prior to coming to work, social distancing and mask wearing while at work, client meeting protocols, contact tracing requirements, and all other policies outlined in this plan.

Employee Name: _____

Employee Signature: _____

Date: _____

Return to Work Form following Quarantine

By signing below, I certify that I have:

- Had a negative COVID-19 Test and am symptom free for 24 hours without taking any medication
- Tested positive for COVID-19, quarantined for 14 days, and have had at least three days with no fever and improved symptoms without fever reducing medication
- Did not take a COVID-19 test, quarantined for 14 days, and have had at least three days with no fever and improved symptoms without fever reducing medication
- Cooperated with any contact tracing required of me by IINE and/or state authorities

Employee Name: _____

Employee Signature: _____

Date: _____