



# Business Continuity Planing in A Public Health Crisis

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# **Easterseals Business Continuity Planning Policy: Public Health Crisis**

## **Overview: The Importance of Business Continuity Planning**

Business Continuity Planning is increasingly part of normal business practice. Recent acts of terrorism, outbreaks of Severe Acute Respiratory Syndrome (SARS) and the Avian Flu, and various widespread natural disasters have served to highlight the importance of business continuity planning by underlining the substantial risk of major operational disruptions for businesses. Best practice is for companies to prepare for a range of eventualities and risks which threaten business continuity. This is particularly important in the context of the risk of an influenza pandemic in the medium term.

### **BCM During Pandemics**

The likelihood is that an influenza pandemic will have a significant impact on the business environment. Just how significant is uncertain. The more severe the pandemic, the greater the likely impact, but it is highly uncertain how severe an influenza pandemic will be. A pandemic will not just affect your business. It will be experienced by other businesses, globally, at roughly the same time.

The following are among the key likely areas of impact of an influenza pandemic.

- It is likely to cause a sharp increase in employee absences, particularly during the main waves of infection. For a typical business, it would be prudent to consider a fairly severe scenario under which employee absences peak at 40% over the two worst weeks in each wave of infection.
- It may disrupt consumer demand, both in terms of volume and in terms of what consumers require.
- It may disrupt the flow of supplies and other inputs that a business needs to operate.
- It may disrupt the operation of systems of transport and logistics used by businesses.
- Businesses will have to make operational changes to reduce the risk of infection in the workplace.

It is not possible to say with certainty what the impact of a pandemic will be on essential business services. Reasonable business planning assumptions for a pandemic of a level of severity that will allow most businesses to continue staffing their operations are as follows.

- Banking, drainage/sewerage, electricity, gas, telecommunications and water, in general core services should continue to operate.
- At the same time, it is plausible that there could be problems with individual providers, or that, for example, individual bank branches might transfer their business to another location.
- Faults and other interruptions to service might be prolonged by a shortage of repair and maintenance staff.

- Businesses should also bear in mind the possibility of more general interruptions to service. Passenger transport (both international and domestic) might be disrupted both by staff absences, and by a reluctance among users to sit in an enclosed space, in close proximity with others whose health status is unknown.
- There may be some disruption to waste collection and disposal, arising from staff shortages.
- Domestic and international logistics services may be affected by staff shortages and also by a reluctance among logistics operators to expose their employees to risk of infection as a result of travel.
- Effective management of supply chains may be affected because of staff shortages which will affect supplies, but also by decisions about the prioritisation of product flow. It is possible that some countries may decide to prioritise domestic markets before export markets in situations where there are shortages.

Business Continuity and Risk Management Planning is a continuing cycle of risk assessment and risk reduction to ensure optimal preparedness to unforeseen events that can present risk to the organization. The process involves the following components.

1. Leadership
2. Business Impact (Liquidity) Analysis
3. Risk assessment
4. Incident and Problem Management
5. Respond to an Emergency

## **1 Assign Key Leadership for Command Center**

In order for any organization to be successful in the case of a public health crisis such as a pandemic, there needs to be leadership, with authorities clearly defined and a strategy for communication across the organization. Easterseals will establish a Command Center including active involvement by the CEO and other key agency leaders. The Command Center will have a local and 1-800 number as well as an e-mail address –all will be checked no less than every 30 minutes. Response times from the Command Center will be less than one hour.

Further, the Command Center will include a Resource Center for the Protection of Staff And Client Households. As a result of the spread of this virus, staff and clients may experience unique family hardships, particularly those who are already vulnerable, i.e., employees with no health insurance, clients or staff who live alone, single parents on limited income etc. To the extent possible, we want to help.

### **1.1 Communication Plan**

One of the first responsibilities of the Command Center Team is to prepare a communications plan, for communication with employees, customers, suppliers and other stakeholders in the business. The plan should identify key contacts (with back-ups), chains of communications, and processes for tracking business and employee status.

Consider preparing platforms, such as dedicated websites and hotlines, for communicating with employees, customers and suppliers about the organization’s status, about the actions it is taking, and about the actions they should take.

Consider preparing notices on subjects such as respiratory hygiene to be used in the event of a pandemic.

The plan should be designed to ensure that communications are culturally and linguistically appropriate. For some businesses, it may be important that communications be made available in more than one language.

Leadership then drives the initial impact analysis and planning as described in the chart below.

Not Started	Underway	Complete	
			Assign responsibility for planning and preparedness to a senior executive and a deputy
			Obtain information on pandemic influenza
			Consult within the company and with labor representatives
			Develop strategy for staff communication
			Assess ‘High Level’ impact on your business and attach appropriate priority to the planning process
			Develop the plan
			Establish authorities, triggers and procedures for implementing plan
			Test plan in exercises
			Revisit plan periodically

## 2 Business Impact Analysis (Liquidity) and Workplace Safety

1. Understand how each program of the company is delivered.

- *What are the critical program environments? (i.e. school, child development centers, mental health clinics)*
  - *What services must be delivered to ensure funded services are not interrupted?*
2. Prioritize critical environments, services or products compared to minimum acceptable delivery levels and the maximum period of time the service can be down, if at all, before resulting in severe damage to the organization:
    - *Identify the impact of disruptions*
    - *Identify areas of potential revenue loss*
    - *Identify additional expenses if a service is inoperable*
    - *Identify intangible losses (e.g. reputation, competitiveness)*
  3. Understand any regulatory framework and insurance requirements to indemnify Easterseals
  4. Create a ranking of the critical business services
  5. Identify dependencies (relocation, employees, assets, suppliers, data required etc.)
  6. Review the critical services
  7. Evaluate IT Business Continuity Planning

The chart below provides a tool for conducting a business impact analysis.

Not Started	Underway	Complete	
			Identify critical activities and the employees and inputs required to maintain them
			Consider the possible impact of employee absences
			Consider the possible impact of disruption to the supply of inputs
			Examine the likely impact of a pandemic on your market and on your customers' requirements
			Identify and agree strategic imperatives
			Understand the business need for face-to-face meetings during a pandemic
			Understand the special needs of some employees during a pandemic

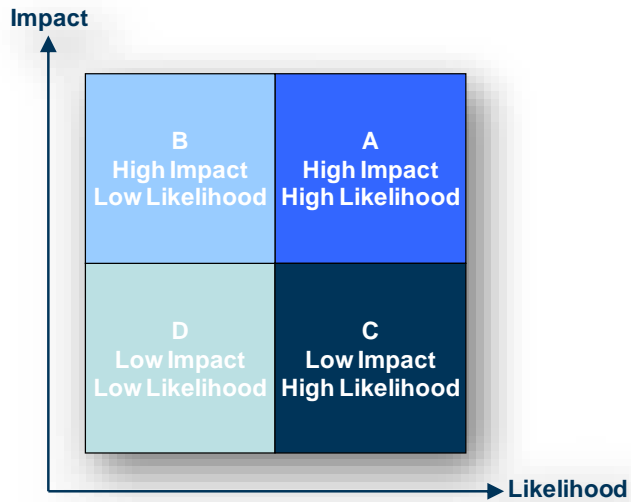
Not Started	Underway	Complete	
			Consider the issues for business related travel during a pandemic
			Consider the financial management implications of a pandemic
			Develop Key Contacts List
			Examine the extent to which others will be dependent on your business in the event of a pandemic
			Consider the circumstances under which you might decide to scale back or suspend operations during a pandemic

### 3 Assessment and Risk Management

Risk is the chance of something happening that will impact Easterseals' business objectives. Risk is normally considered in terms of likelihood of a hazard affecting the business. By assessing the risks associated with interrupting business it is possible to prioritise the risk reduction activities, i.e. the processes that must be implemented. Therefore, the risk assessment should identify the following:

- Hazards to business
- Financial Impact
- Impact of each hazard on the work of Easterseals (physical disruptions with financial implications to both Easterseals and the consumers affected)
- Mitigation in place or possible (prevent or reduce the likelihood and/or impact of the hazard)
- Apply the risk score matrix:





Below please find a chart to assist in assessing the areas of risk.

Not Started	Underway	Complete	
			Review insurance
			Consider Impact of Workforce Reductions
			Client Absenteeism -plan for measures to serve a reduced population
			Identify impact of Program Closures
			Carefully Examine Balance Sheet Impact
			Calculate Paid Time off Exposure
			Consider Impact of Transportation Closures
			Examine impact of Banking or line of credit pressure
			Evaluate impact of Cancellation or Delay of Major events that generate resources

Not Started	Underway	Complete	
			Conduct Information Technology Analysis
			Consider Impact of Supply Chain Disruption

### 3.1.1 Review of Insurance Coverage

Review all aspects of insurance coverage, to ensure it is likely to be sufficient for circumstances likely to arise in a pandemic. Among the areas of insurance you may wish to consider reviewing are:

- Loss of profits cover;
- “Key man” insurance;
- Liabilities that may arise from a pandemic;
- Whether levels of cover are adequate;
- Whether any exclusions may be relevant.
- Discuss with your insurance broker whether your business is well covered.

### 3.2 Workforce Reductions

Determine which programs are most vulnerable to workforce reductions. Develop plan to fill gaps in workforce.

### 3.3 Consumer Absenteeism

Consumer Absenteeism will result in decrease in revenue. Explore strategies to provide services via technological platforms.

### 3.4 Program Closures

Some programs may need to be closed due to risk of spreading of virus. Evaluate financial impact to company as a result of reduction in service revenue and expenses related to Paid Time Off as appropriate.

### 3.5 Balance Sheet Impact

Revenue reduction may result in a significant decrease in revenue. Scenarios need to be developed to evaluate impact of decreased revenue—program by program.

### 3.6 Paid Time Exposure

As indicated, staff may be forced to stay home from work, using vacation or sick time at a high rate.

### **3.7 Transportation Closures**

The impact of the closure of major transportation systems needs to be considered as it will have an adverse affect on staff ability to get to work and client ability to access services.

### **3.8 Banking or Line of Credit Pressure**

These reductions in revenue, while facing increased expenses will result in a need to access credit line. This pressure on credit needs to be planned for,

### **3.9 Cancellation of Major Fund-Raising Events**

When major, highly visible fund raising events are cancelled this puts additional pressure on the company in terms of revenue, cash flow and credit line.

### **3.10 Information Technology Analysis**

A business impact analysis (BIA) must be performed by Easterseals Information Technology Department part of regularly scheduled risk assessment activities. At the very least, the business impact analysis must result in the specification of the following:

Downtime and Recovery Period - The maximum period that Easterseals can go without critical information systems, defined as one of the following:

LEVEL 1: Short-Term outage or interruption, which is a period that Easterseals can go without specific technology based service(s). For most services, this can be defined as 1-2 days.

LEVEL 2: Medium-Term (Temporary) outage or interruption, which is a period that Easterseals can't wait out an outage or interruption of services and will execute its formal disaster recovery strategy. This includes redirecting resources and services to alternative Easterseals sites. It can/will include prequalified vendor sites. For most services, this can be defined as a period of up to (6) six weeks.

LEVEL 3: Long-Term (Severe/Relocation) outage or interruption, which is a period where environmental factors involved would require relocation for an extended period. Easterseals alternate MPLS sites would be used to offset the crisis in the interim until a long-term location/solution could be executed.

- Recovery State - the minimum acceptable production information systems recovery configuration
- Loss Analysis - analysis of the financial losses potentially incurred during the outage
- Risk Analysis - a qualitative residual risk assessment.
- Asset Criticality Rating - asset criticality analysis.
- Analysis of legal or business requirements for reporting disruptions

### **3.11 Supply Chain Disruption**

A decades-long focus on supply chain optimization to minimize costs, reduce inventories, and drive up asset utilization has removed buffers and flexibility to absorb disruptions—and COVID-

19 illustrates that many companies are not fully aware of the vulnerability of their supply chain relationships to global shocks.

## **4 Incident and Response Management**

Incidents that cause interruption of critical services and/or processes have an impact on the Business Continuity and Risk Management of Easterseals. It is the responsibility of leadership to identify these risks, potential impact on services and prepare a plan to remove or reduce their likelihood by implementing appropriate processes and procedures.

### **4.1 Preparedness and Risk Reduction**

Operational procedures will need to take into consideration the special measures required. Examples can include:

- Loss of key programmatic staff due to being sent home.
- Closure of facility
- Cancellation of group meetings/sessions
- Putting in place data back-up procedures to protect business critical information
- Identifying back-up resources to maintain normal service in case of high levels of absence

### **4.2 Incident Response**

It is important that recovery procedures are in place if the worst case happens, allowing Easterseals to return business as usual as soon as possible.

- The cause of incidents may be obvious and can be addressed without the need for further investigation, resulting in a repair or a work around to remove the error or re-training of employees involved
- When an incident is considered to be serious or multiple occurrences of similar incidents are observed, a problem record might be created as a result. The management of a problem is typically performed by different staff and therefore is controlled by the problem management process. Correction and future prevention are addressed using the Continuous Improvement process

The main goal of the incident management process is to restore 'normal service operation' as fast as possible and assure Business Continuity. The targets of Incident and Problem Management are to minimize the severe impact of incidents and problems to the business and/or to prevent recurrence of incidents related to these errors.

### **4.3 Principles of Incident and Problem Management**

Easterseals will adhere to the following principles of Incident Management:

- Each incident must be recorded and response tracked.
- An incident owner is designated for each incident

- Incident management delivers data oriented information management based on the disturbance and its impact on the services.
- High priority incidents or incidents that are of a complex nature should be managed by the Command Center with the appropriate resources focusing only on restoring the service or finding a work around, working like a project team with a designated leader

#### 4.4 Information and Escalation

Incident Management includes a clearly agreed notification scheme that defines who should be informed about what and when.

The notification scheme should be aligned with an escalation process. The single most important aspect of Incident Management is good communication, demonstrating empathy and clear direction on what Easterseals will do to address the situation.

The process of information and/or escalation can be documented in an Escalation Scheme/Matrix:

- Incident priority
- Units to escalate to
- Units to be notified
- Media for escalation/notification

The following information has to be delivered when reporting an incident:

1.	<b>Description</b>	Staff member exposed in the community
2.	<b>Name of Requester</b>	Who reported the incident
3.	<b>Type, Event</b>	Specify incident impact (e.g. staff absence potential closure of facility).
4.	<b>Priority</b>	Define priority (high/medium/low)
5..	<b>Work Log</b>	Describe activities taken as well as change of status

## 5 Human Resource Policies

**Establish policies on sick leave absences unique to a pandemic.** These should take account of:

- The likelihood that it will not be practicable for medical practitioners to examine and certify all employees who become ill;
- the need to protect others in the workplace from infection by people who are ill; and

- the need to judge when a person is no longer infectious, and can return to work (when they feel better, and no longer show symptoms, subject to obtaining more up-to-date guidance once the characteristics of the pandemic strain are known).

**Prepare policies on attendance during a pandemic by employees showing symptoms of influenza, or who are suspected to be infected with influenza.**

- Plan on asking those with symptoms of influenza to stay away from the workplace.
- Taking account of guidance from the Department of Health and Children, the Health Service Executive and other sources, prepare policies on:
- Assessing whether staff are showing symptoms of influenza; and
- The measures to be taken if a member of staff is found to be showing symptoms of influenza while at the workplace.

**Establish policies on compassionate leave unique to a pandemic, to cover circumstances such as:**

- Where employees are bereaved;
- Where employees face a pressing need to provide care for others; or
- Where employees are at high risk if they become infected, and cannot adequately limit their risk of infection in the workplace.

**Consider what the business’s response should be to absenteeism during a pandemic, taking account of:**

- The business’s need to have employees attend so as to maintain business continuity and activity;
- The pressures some staff may be under to remain away from work; and
- The common interest that the business and employees have in business survival and in limiting employee turnover.

**5.1.1 Telecommuting**

Asses whether Easterseals should expand the ability for more employees to telecommute. Taking account of security risks and operational issues, consider developing the infrastructure to make more parts of your IT systems remotely accessible.

The chart on the following page provides a structure for activities and analysis in this phase of the Business Continuity Planning.

Not Started	Underway	Complete	
			Cross-train, and identify alternative sources of labor
			Communicate with staff in a manner appropriate to the current state of pandemic alert

Not Started	Underway	Complete	
			Plan for increased take-up of employee welfare services
			Prepare policies on sick leave and compassionate leave during a pandemic
			Prepare policies on foreign travel during a pandemic
			Plan for the needs of staff overseas
			Make arrangements to assure supplies in the event of a pandemic
			Prepare policies on hygienic employee behavior during a pandemic
			Plan to provide for hand washing, hand hygiene, tissue disposal and other facilities
			Plan for frequent and effective cleaning of the workplace
			Prepare policies on attendance by employees who are infected, or are suspected to be infected, with influenza
			Identify measures that can be taken to reduce potential for employees who are in the workplace to infect each other
			Prepare policies on flexible work locations (e.g. teleworking) and flexible working times (e.g. shift working)
			Ensure infrastructure supports teleworking and remote customer interaction

## **6 Respond to any Emergency**

Emergency situations may arise that causes closure of all or part of the site. Easterseals management will work to ensuring that essential business functions can continue, as far as reasonable while taking the utmost precautions to ensure the safety of staff and consumers.

### **6.1 Emergency Response**

*.It is the responsibility of the Command Center Leadership Team to ensure the following;*

- Take measures to ensure information dissemination and rapid response to inquiries.
- Guidance on measures for minimizing exposure and impact
- Communication and contacts as required
- Media relations and communication
- Guidance for successful resumption of the business from the concerned units at the alternative location
- Recruiting and education of all agency leaders
- Implementation and ongoing monitoring of Business Continuity infrastructure

### **6.2 Emergency Checklist**

A checklist of actions that may be appropriate when an emergency occurs must be developed. This checklist can be used during an emergency to ensure that no major tasks are forgotten (the list below is an example only):

- Start a log of actions taken
- Identify any damage (to staff, contractors, public, buildings, equipment, vehicles, stock, reputation)
- Identify functions disrupted
- Provide information to staff
- Decide on course of action
- Communicate decisions to staff and business partners
- Provide public information to maintain reputation and business
- Review the Business Continuity and Risk Management Plan
- Key Contact List
- Roles and Responsibilities
- Escalation process (chain of commands)

### **6.3 Testing the Plan**

It is important that, once a plan is written, the procedures put in place are tested.



- Periodic checks of the provided Business Continuity and Risk Management infrastructure
- Periodic checks and updates of the Business Continuity and Risk Management documentation (plans, schemes, check lists, contact list, supplier list, forms)
- Periodic tests of communication with Business Continuity and Risk Management team members
- Periodic education and/or refresher training

Employees of Easterseals need to be familiar with the content of the plan and their role in the response and recovery if they are involved. The plan can be tested by acting out a scenario.

## 7 Protocols

### 7.1 Facilities Pandemic Protocol

In response Easterseals Facilities Department has implemented an enhanced cleaning protocol. This protocol will remain in effect for the duration of a health crisis.

This protocol describes the enhanced cleaning techniques, frequency of cleaning, additional areas to be addressed and the methods to be used. Implementation will differ where Easterseals provides its own cleaning services as opposed to locations where cleaning is provided by a third-party vendor.

We've also included CDC and OSHA recommendations for the current situation.

#### **Common Area key touch points:**

- Reception Desks/Counters
- Countertops/desktops
- Lighting controls/switches
- Elevator buttons
- Stair rails
- Door handles
- Breakroom/Pantry counters

#### **Disinfection frequency:**

Common area key touch points will be regularly sanitized at least once per hour.

Cleaning Activity logs will be posted and completed each hour for bathrooms and pantries.

#### **Disinfecting chemicals and supplies:**

Lysol or Clorox wipes can be used by staff for their disinfecting needs.

Facilities staff will use a bleach solution (1/3<sup>rd</sup> cup bleach to 1 gallon water) separate cleaning clothes for disinfection.

Hand sanitizer dispensers have been added, additional refill supplies ordered and batteries have been changed to ensure proper operation of the touchless dispensers.

At locations where cleaning is provided by a third-party vendor or as a building service, property management will be contacted for their COVID-19 cleaning protocol/procedure and we will seek to share that information with the site personnel.

Additional measures include engaging HVAC contractors to monitor and change air handling filters more frequently, where applicable.

## ***7.2 Protocols Protocol for Managing Suspected Contamination or Illness***

Any staff member exhibiting symptoms of coughing, fever, shortness of breath must contact their Supervisor or designee. If yes to any of the symptoms, staff will be sent home and directed to contact their healthcare provider, urgent care center or hospital emergency room.

Any staff member who has encountered an individual who has not been diagnosed but suspected of encountering someone who has the Coronavirus virus, will be sent home for self-quarantine for 14 days and self-monitor for symptoms. If any symptoms occur, the individual will contact their healthcare provider, urgent care center or hospital for testing.

Any staff member who reports encountering an individual that has tested positive for coronavirus, will be sent home to self-quarantine for 14 days. If any symptoms occur, the staff member will contact their healthcare provider, urgent care center or hospital for testing. In the case that a staff member tests positive during this quarantine period, they will be required to provide medical clearance to return to work.

Staff may return to work under the conditions that they have not displayed any symptoms for 24 hours.

## 8 Sample Staff and Family Communications

### 8.1 Communication #1

Dear Staff,

Like most of you, we are closely monitoring news reports of coronavirus. Your health and safety, and that of the individuals we serve is our paramount concern. This is a fast-changing situation. As it unfolds we will announce appropriate preparedness and response measures based on the recommendations of local and state public health agencies, as well as the Center for Disease Control and Prevention (CDC).

To date, the risk of contracting coronavirus is low. There are currently two known cases in New York, eleven in Texas (all located in San Antonio) one in MA, one in NH, and no known cases in Maine, Virginia, and NJ. 39 cases have been confirmed in the UK and 27 in Canada.

Please [click here](#) for recommendations on preventive actions everyone can take to stop the spread of coronavirus, the flu and other germs; [click here](#) for a current CDC summary of the coronavirus outbreak, [and click here](#) for a Harvard Business Review article about coronavirus and the workplace.

Preventive measures for coronavirus are the same as those for flu and other viruses:

- Wash your hands often with soap and water for at least 20 seconds, especially after going to the bathroom; before eating; and after blowing your nose, coughing or sneezing. If soap and water aren't available, use an alcohol-based sanitizer that is at least 60% alcohol.
- Avoid close contact with people who are sick.
- Avoid touching your eyes, nose and mouth.
- Stay home when you are sick.
- Cover your cough or sneeze with a tissue, then throw the tissue in the trash.
- Clean and disinfect frequently touched objects and surfaces using a regular household cleaning spray or wipe.

We will continue to use our internal communication structure to keep you informed, including working through senior leaders, information posted on the intranet and all staff e-mails.

Please do not hesitate to reach out to me or your supervisor with concerns.

Sincerely,

A handwritten signature in blue ink that reads "Christi". The signature is written in a cursive, flowing style.

## **8.2 Communication #2**

Dear Staff,

As part of our preparedness and response plan to coronavirus, we have established a Command Center and hotline:

- Local number: **646-931-2400**
- Toll Free number: **844-653-0340**
- Email: [alucas@fedcap.org](mailto:alucas@fedcap.org)

Aisha Lucas and her team are leading the Command Center and will respond to all emails and voice messages. Do not hesitate to contact the hotline with any questions or concerns you may have regarding coronavirus. Your health and safety and that of those we serve is our paramount concern.

Remember, prevention is the best way to stop the spread of coronavirus. [Please click here](#) to view a fact sheet from NYC Department of Health that includes preventive measures everyone should take to protect themselves and others. [Click here](#) for the latest information about the coronavirus outbreak and related information from the Center for Disease Control and Prevention.

Sincerely,

A handwritten signature in blue ink that reads "Christi".

## **8.3 Communication to Families**

Dear Easterseals Families,

We are all concerned about the coronavirus pandemic. Our priority is protecting the health and safety of Easterseals children and families and that of our staff.

We are doing everything possible to keep our Easterseals Child Development Centers open—and safe. All surfaces in our centers are being cleaned hourly, and every night

we are deep cleaning each center. We are teaching the children how to wash their hands thoroughly and frequently.

Easterseals is closely monitoring this fast-changing public health crisis and will continue to follow recommendations and instructions from city, state and federal health agencies.

We know how important Easterseals Child Development Centers are to you as parents and to our communities, and that you rely on us to help your children learn, play and grow. We also understand the hardship you could encounter if the center closes. This matters to us and we are working hard to keep all centers open and safe.

**Please do not hesitate to contact us with questions and concerns.**

We all have a role to play in stopping the spread of coronavirus. [Please click here](#) to read Center for Disease Control and Prevention recommendations for protecting yourself and others.

Sincerely,

A handwritten signature in blue ink, appearing to read "Christi". The signature is written in a cursive, flowing style.

## 9 Posters

