

## PANDEMIC PREPAREDNESS PLANNING

### Purpose

This template is a sample model COVID-19 prevention program offering considerations for churches to use during their COVID-19 prevention planning. Churches are reminded to check with their state and local government for additional guidance. Prior to implementing their plan, it is recommended that churches consult with legal counsel to ensure their plan meets specific federal, state and local requirements. (delete this section)

### Disclaimer

This form is provided as a sample for informational purposes only, and not for the purpose of providing legal advice. You should contact your attorney to obtain advice with respect to any particular contractual or legal matter as may apply in your state. Use of this form does not create an attorney-client relationship.

(delete this section)

SAMPLE

## PANDEMIC PREPAREDNESS PLANNING

### COVID-19 Prevention Program (CPP) for **[Name of Company, or name of the workplace if it's for a fixed location.]**

This CPP is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace.

**Date:** **[type date of last review]**

#### Authority and Responsibility

**[Enter name or job title of the person(s)]** has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

All employees are responsible for using safe work practices, following all directives, policies and procedures, and assisting in maintaining a safe work environment.

#### Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the **Appendix B: COVID-19 Inspections form** as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.
- **[Enter other identification and evaluation measures you take in your workplace].**

#### Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: **[Describe how employees and their representatives, if any, may participate in COVID-19 hazard identification and evaluation.]**

#### Employee screening

We screen our employees by: **[describe how this will be accomplished – i.e., directly screen employees when they come to work, or having them self-screen according to CDPH guidelines. Ensure that face coverings are used during screening by both screeners and employees and, if temperatures are measured, that non-contact thermometers are used.]**

#### Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented on the **Appendix B: COVID-19 Inspections** form, and corrected in a timely manner based on the severity of the hazards, as follows:

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[Describe how the following will be accomplished: (1) the severity of the hazard will be assessed and correction time frames assigned, accordingly; (2) Individuals are identified as being responsible for timely correction; (3) follow-up measures are taken to ensure timely correction.]

### Control of COVID-19 Hazards

#### Physical Distancing

Where possible, we ensure at least six feet of physical distancing at all times in our workplace by: [Describe your specific workplace methods, which can include: (1) eliminating the need for workers to be in the workplace – e.g., telework or other remote work arrangements; (2) reducing the number of persons in an area at one time, including visitors; (3) visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel; (4) staggered arrival, departure, work, and break times; (5) adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees; or (6) reference section 3205(c)(6) for details]

Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

#### Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department. [Describe how face coverings will be provided, replaced, and cleaned, as needed, as well as what your policies are should your employees encounter non-employees that are not wearing face coverings].

The following are exceptions to the use of face coverings in our workplace:

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
- **[delete if not applicable]** Employees wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.
- **[delete if not applicable]** Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19.

#### Engineering controls

We implement the following measures for situations where we cannot maintain at least six feet between individuals: **[enter your site-specific measures, which can include installing solid partitions.]**

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We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by: **[describe how this will be accomplished, taking into consideration: (1) circumstances where the amount of outside air needs to be minimized due to other hazards, such as heat and wildfire smoke; (2) how the ventilation system will be properly maintained and adjusted, whether you own and operate the building, or not; and (3) whether it is possible to increase filtration efficiency to the highest level compatible with the existing ventilation system.]**

### Cleaning and disinfecting

We implement the following cleaning and disinfection measures for frequently touched surfaces: **[describe your workplace-specific measures, including: (1) ensuring adequate supplies and adequate time for it to be done properly; and (2) informing the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection.]**

Should we have a COVID-19 case in our workplace, we will implement the following procedures: **[describe how the cleaning and disinfection will be done of areas, materials, and equipment used by a COVID-19 case during the high-risk exposure period. Address whether an outside service will be used or how the employees you use are properly equipped and trained.]**

### Shared tools, equipment and personal protective equipment (PPE)

PPE must not be shared, e.g., gloves, goggles and face shields.

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by **[describe how this will be done in your workplace, such as use of a cleaning/sanitizing crew or providing the employees with the materials and training to do it themselves].**

**[Delete if not applicable to your workplace.]** Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users.

### Hand sanitizing

In order to implement effective hand sanitizing procedures, we: **[describe your site-specific procedures, including: (1) evaluating handwashing facilities; (2) determining the need for additional facilities; (3) encouraging and allowing time for employee handwashing; (4) providing employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol); (5) encouraging employees to wash their hands for at least 20 seconds each time.]**

### Personal protective equipment (PPE) used to control employees' exposure to COVID-19

We evaluate the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, and provide such PPE as needed.

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained. **[reference section 3205(c)(E) for details on required respirator and eye protection use.]**

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We provide and ensure use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids. [Delete if not applicable to your workplace.]

### Investigating and Responding to COVID-19 Cases

This will be accomplished by using the **Appendix C: Investigating COVID-19 Cases** form.

Employees who had potential COVID-19 exposure in our workplace will be: **[indicate how the following will be accomplished: (1) offered COVID-19 testing at no cost during their working hours; and (2) the information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to them.]**

### System for Communicating

Our goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and that it includes the following information:

- Who employees should report COVID-19 symptoms and possible hazards to, and how **[Describe how this will be accomplished in your workplace]**.
- That employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Where testing is not required, how employees can access COVID-19 testing **[determine what options are available for employees to obtain voluntary testing, be it employer provided, available through health plans or local testing centers. The purpose is to give employees the tools to get tested when they have symptoms to reduce the likelihood of bringing the virus to work. This type of voluntary testing does not have to be provided by the employer]**.
- In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test. **[If you are required to provide testing because of an employee exposure, have a plan for how this will be accomplished at no cost to the employee during working hours, including when the testing is in response to CCR Title 8 section 3205.1, Multiple COVID-19 Infections and COVID-19 Outbreaks, as well as section 3205.2, Major COVID-19 Outbreaks. It is recommended that the plan be developed in advance for large or high-risk workplaces.]**
- Information about COVID-19 hazards employees (including other employees and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures.
- **[Describe other aspects of your system of COVID-19 related communication being implemented in your workplace].**

### Training and Instruction

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:

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- COVID-19 is an infectious disease that can be spread through the air.
- COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
- An infectious person may have no symptoms.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of facecoverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- **[Describe other aspects of your training being implemented in your workplace].**

**[If applicable]** Appendix D: COVID-19 Training Roster will be used to document this training.

### Exclusion of COVID-19 Cases

Where we have a COVID-19 case in our workplace, we will limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished by **[describe how your workplace will accomplish this, such as by employer-provided employee sick leave benefits, payments from public sources or other means of maintaining earnings, rights and benefits, where permitted by law and when not covered by workers' compensation].**
- Providing employees at the time of exclusion with information on available benefits.

### Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use the **Appendix C: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

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- **[add any additional measure you are taking.]**

### Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
    - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
    - COVID-19 symptoms have improved.
    - At least 10 days have passed since COVID-19 symptoms first appeared.
  - COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
  - A negative COVID-19 test will not be required for an employee to return to work.
  - If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.
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**[Type Title of owner or top management representative formally approving the program and have them sign and date]**





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**Appendix B: COVID-19 Inspections**

**[This form is only intended to get you started. Review the information available at [www.dir.ca.gov/dosh/coronavirus/](http://www.dir.ca.gov/dosh/coronavirus/) for additional guidance on what to regularly inspect for, including issues that may be more pertinent to your particular type of workplace. You will need to modify form accordingly.]**

Date: **[enter date]**

Name of person conducting the inspection: **[enter names]**

Work location evaluated: **[enter information]**

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
<b>[add any additional controls your workplace is using]</b>			
<b>[add any additional controls your workplace is using]</b>			
<b>Administrative</b>			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
<b>[add any additional controls your workplace is using]</b>			
<b>[add any additional controls your workplace is using]</b>			
<b>PPE (not shared, available and being worn)</b>			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
<b>[add any additional controls your workplace is using]</b>			

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**Appendix C: Investigating COVID-19 Cases**

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 testing or related medical services provided by us will be provided in a manner that ensures the confidentiality of employees, with the exception of unredacted information on COVID-19 cases that will be provided immediately upon request to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law.

All employees’ medical records will also be kept confidential and not disclosed or reported without the employee’s express written consent to any person within or outside the workplace, with the following exceptions: (1) Unredacted medical records provided to the local health department, CDPH, Cal/OSHA, NIOSH, or as otherwise required by law immediately upon request; and (2) Records that do not contain individually identifiable medical information or from which individually identifiable medical information has been removed.

**Date:** [enter date]

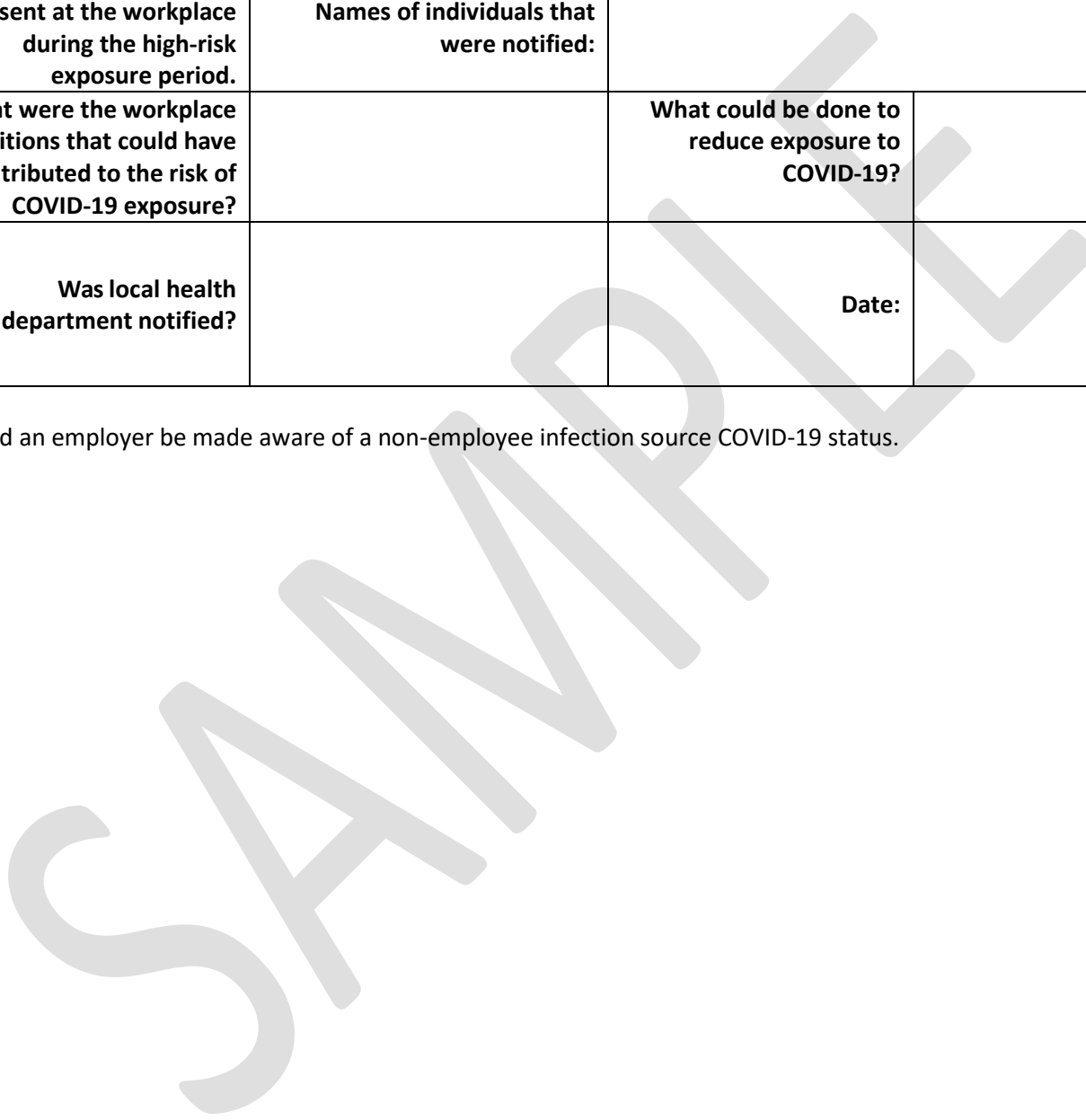
**Name of person conducting the investigation:** [enter name(s)]

<b>Employee (or non-employee*) name:</b>		<b>Occupation (if non-employee, why they were in the workplace):</b>	
<b>Location where employee worked (or non-employee was present in the workplace):</b>		<b>Date investigation was initiated:</b>	
<b>Was COVID-19 test offered?</b>		<b>Name(s) of staff involved in the investigation:</b>	
<b>Date and time the COVID-19 case was last present in the workplace:</b>		<b>Date of the positive or negative test and/or diagnosis:</b>	
<b>Date the case first had one or more COVID-19 symptoms:</b>		<b>Information received regarding COVID-19 test results and onset of symptoms (attach documentation):</b>	
<b>Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):</b>			
<b>Notice given (within one business day, in a way that does not reveal any personal identifying information of the</b>			

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<b>COVID-19 case) of the potential COVID-19 exposure to:</b>			
<b>All employees who may have had COVID-19 exposure and their authorized representatives.</b>	<b>Date:</b>		
	<b>Names of employees that were notified:</b>		
<b>Independent contractors and other employers present at the workplace during the high-risk exposure period.</b>	<b>Date:</b>		
	<b>Names of individuals that were notified:</b>		
<b>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</b>		<b>What could be done to reduce exposure to COVID-19?</b>	
<b>Was local health department notified?</b>		<b>Date:</b>	

\*Should an employer be made aware of a non-employee infection source COVID-19 status.



**Appendix D: COVID-19 Training Roster**

Date: **[enter date]**

Person that conducted the training: **[enter name(s)]**

Employee Name	Signature

## **Additional Consideration #1**

### **Multiple COVID-19 Infections and COVID-19 Outbreaks**

**[This section will need to be added to your CPP if your workplace is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in your workplace within a 14-day period. Reference section 3205.1 for details.]**

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

#### **COVID-19 testing**

- We will provide COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period. COVID-19 testing will be provided at no cost to employees during employees' working hours.
- COVID-19 testing consists of the following:
  - All employees in our exposed workplace will be immediately tested and then tested again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by, the local health department.
  - After the first two COVID-19 tests, we will continue to provide COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
  - We will provide additional testing when deemed necessary by Cal/OSHA.

#### **Exclusion of COVID-19 cases**

We will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria** requirements, and local health officer orders if applicable.

#### **Investigation of workplace COVID-19 illness**

We will immediately investigate and determine possible workplace-related factors that contributed to the COVID-19 outbreak in accordance with our CPP **Investigating and Responding to COVID-19 Cases**.

#### **COVID-19 investigation, review and hazard correction**

In addition to our CPP **Identification and Evaluation of COVID-19 Hazards** and **Correction of COVID-19 Hazards**, we will immediately perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19.

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
  - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
  - Our COVID-19 testing policies.
  - Insufficient outdoor air.
  - Insufficient air filtration.
  - Lack of physical distancing.
- Updating the review:
  - Every thirty days that the outbreak continues.
  - In response to new information or to new or previously unrecognized COVID-19 hazards.
  - When otherwise necessary.
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We will consider:
  - Moving indoor tasks outdoors or having them performed remotely.
  - Increasing outdoor air supply when work is done indoors.
  - Improving air filtration.
  - Increasing physical distancing as much as possible.
  - Respiratory protection.
  - [describe other applicable controls].

#### **Notifications to the local health department**

- Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in our workplace, we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- We will provide to the local health department the total number of COVID-19 cases and for each COVID-19 case, the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and North American Industry Classification System code of the workplace of the COVID-19 case, and any other information requested by the local health department. We will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace.

## **Additional Consideration #2**

### **Major COVID-19 Outbreaks**

**[This section will need to be added to your CPP should your workplace experience 20 or more COVID-19 cases within a 30-day period. Reference section 3205.2 for details.]**

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

#### **COVID-19 testing**

We will provide twice a week COVID-19 testing, or more frequently if recommended by the local health department, to all employees present at our exposed workplace during the relevant 30-day period(s) and who remain at the workplace. COVID-19 testing will be provided at no cost to employees during employees' working hours.

#### **Exclusion of COVID-19 cases**

We will ensure COVID-19 cases and employees with COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases and Return to Work Criteria**, and any relevant local health department orders.

#### **Investigation of workplace COVID-19 illnesses**

We will comply with the requirements of our CPP **Investigating and Responding to COVID-19 Cases**.

#### **COVID-19 hazard correction**

In addition to the requirements of our CPP **Correction of COVID-19 Hazards**, we will take the following actions:

- In buildings or structures with mechanical ventilation, we will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, we will use filters with the highest compatible filtering efficiency. We will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems would reduce the risk of transmission and implement their use to the degree feasible.
- We will determine the need for a respiratory protection program or changes to an existing respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- We will evaluate whether to halt some or all operations at our workplace until COVID-19 hazards have been corrected
- Implement any other control measures deemed necessary by Cal/OSHA.

#### **Notifications to the local health department**

We will comply with the requirements of our **Multiple COVID-19 Infections** and **COVID-19 Outbreaks-Notifications to the Local Health Department.**

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## Additional Consideration #3

### COVID-19 Prevention in Employer-Provided Housing

[This section will need to be added to your CPP if you have workers in employer-provided housing. Reference section 3205.3 for details. Employer-provided housing is any place or area of land, any portion of any housing accommodation, or property upon which a housing accommodation is located, consisting of: living quarters, dwelling, boardinghouse, tent, bunkhouse, maintenance-of-way car, mobile home, manufactured home, recreational vehicle, travel trailer, or other housing accommodations. Employer-provided housing includes a “labor camp” as that term is used in title 8 of the California Code of Regulations or other regulations or codes. The employer-provided housing may be maintained in one or more buildings or one or more sites, including hotels and motels, and the premises upon which they are situated, or the area set aside and provided for parking of mobile homes or camping. Employer-provided housing is housing that is arranged for or provided by an employer, other person, or entity to workers, and in some cases to workers and persons in their households, in connection with the worker’s employment, whether or not rent or fees are paid or collected.

- This section does not apply to housing provided for the purpose of emergency response, including firefighting, rescue, and evacuation, and support activities directly aiding response such as utilities, communications, and medical operations, if:
  - The employer is a government entity; or
  - The housing is provided temporarily by a private employer and is necessary to conduct the emergency response operations.
- The requirements below for Physical distancing and controls, Face coverings, Cleaning and disinfecting, Screening, and Isolation of COVID-19 cases and persons with COVID-19 exposure do not apply to occupants, such as family members, who maintained a household together prior to residing in employer-provided housing, but only when no other persons outside the household are present.]

#### Assignment of housing units

We will ensure that shared housing unit assignments are prioritized in the following order:

- Residents who usually maintain a household together outside of work, such as family members, will be housed in the same housing unit without other persons.
- Residents who work in the same crew or work together at the same worksite will be housed in the same housing unit without other persons.
- Employees who do not usually maintain a common household, work crew, or worksite will be housed in the same housing unit only when no other housing alternatives are possible.

#### Physical distancing and controls

We will ensure:

- The premises are of sufficient size and layout to permit at least six feet of physical distancing between residents in housing units, common areas, and other areas of the premises.

- Beds are spaced at least six feet apart in all directions and positioned to maximize the distance between sleepers' heads. For beds positioned next to each other, i.e., side by side, the beds will be arranged so that the head of one bed is next to the foot of the next bed. For beds positioned across from each other, i.e., end to end, the beds will be arranged so that the foot of one bed is closest to the foot of the next bed. Bunk beds will not be used.
- Maximization of the quantity and supply of outdoor air and increase filtration efficiency to the highest level compatible with the existing ventilation system in housing units.

### **Face coverings**

We will provide face coverings to all residents and provide information to residents on when they should be used in accordance with state or local health officer orders or guidance.

### **Cleaning and disinfection**

We will ensure that:

- Housing units, kitchens, bathrooms, and common areas are effectively cleaned and disinfected at least once a day to prevent the spread of COVID-19. Cleaning and disinfecting shall be done in a manner that protects the privacy of residents.
- Unwashed dishes, drinking glasses, cups, eating utensils, and similar items are not shared.

### **Screening**

We will encourage residents to report COVID-19 symptoms to **[enter name of individual, position, or office]**.

### **COVID-19 testing**

We will establish, implement, and maintain effective policies and procedures for COVID-19 testing of occupants who had a COVID-19 exposure, who have COVID-19 symptoms, or as recommended by the local health department.

### **Isolation of COVID-19 cases and persons with COVID-19 exposure**

We will:

- Effectively isolate COVID-19 exposed residents from all other occupants. Effective isolation will include providing COVID-19 exposed residents with a private bathroom, sleeping area, and cooking and eating facility.
- Effectively isolate COVID-19 cases from all occupants who are not COVID-19 cases. Effective isolation will include housing COVID-19 cases only with other COVID-19 cases, and providing COVID-19 case occupants with a sleeping area, bathroom, and cooking and eating facility that is not shared by non-COVID-19-case occupants.
- Keep confidential any personal identifying information regarding COVID-19 cases and persons with COVID-19 symptoms, in accordance with our CPP **Investigating and Responding to COVID-19 Cases**.

- End isolation in accordance with our CPP **Exclusion of COVID-19 Cases and Return to Work Criteria**, and any applicable local or state health officer orders.

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## Additional Consideration #4

### COVID-19 Prevention in Employer-Provided Transportation to and from Work

[This section will need to be added to your CPP if there is employer-provided motor vehicle transportation to and from work, which is any transportation of an employee, during the course and scope of employment, provided, arranged for, or secured by an employer including ride-share vans or shuttle vehicles, car-pools, and private charter buses, regardless of the travel distance or duration involved. Reference section 3205.4 for details.]

This section does not apply:

- If the driver and all passengers are from the same household outside of work, such as family members.
- To employer-provided transportation when necessary for emergency response, including firefighting, rescue, and evacuation, and support activities directly aiding response such as utilities, communications and medical operations.]

#### Assignment of transportation

We will prioritize shared transportation assignments in the following order:

- Employees residing in the same housing unit will be transported in the same vehicle.
- Employees working in the same crew or worksite will be transported in the same vehicle.
- Employees who do not share the same household, work crew or worksite will be transported in the same vehicle only when no other transportation alternatives are possible.

#### Physical distancing and face coverings

We will ensure that the:

- Physical distancing and face covering requirements of our CPP **Physical Distancing and Face Coverings** are followed for employees waiting for transportation.
- Vehicle operator and any passengers are separated by at least three feet in all directions during the operation of the vehicle, regardless of the vehicle's normal capacity. Vehicle operator and any passengers are provided and wear a face covering in the vehicle as required by our CPP **Face Coverings**.

#### Screening

We will develop, implement, and maintain effective procedures for screening and excluding drivers and riders with COVID-19 symptoms prior to boarding shared transportation.

#### Cleaning and disinfecting

We will ensure that:

- All high-contact surfaces (door handles, seatbelt buckles, armrests, etc.) used by passengers are cleaned and disinfected before each trip.
- All high-contact surfaces used by drivers, such as the steering wheel, armrests, seatbelt buckles, door handles and shifter, are cleaned and disinfected between different drivers.
- We provide sanitizing materials, training on how to use them properly, and ensure they are kept in adequate supply.

### **Ventilation**

We will ensure that vehicle windows are kept open, and the ventilation system set to maximize outdoor air and not set to recirculate air. Windows do not have to be kept open if one or more of the following conditions exist:

- The vehicle has functioning air conditioning in use and the outside temperature is greater than 90 degrees Fahrenheit.
- The vehicle has functioning heating in use and the outside temperature is less than 60 degrees Fahrenheit.
- Protection is needed from weather conditions, such as rain or snow.
- The vehicle has a cabin air filter in use and the U.S. EPA Air Quality Index for any pollutant is greater than 100.

### **Hand hygiene**

We will provide hand sanitizer in each vehicle and ensure that all drivers and riders sanitize their hands before entering and exiting the vehicle. Hand sanitizers with methyl alcohol are prohibited.

## PANDEMIC PREPAREDNESS PLANNING

### Purpose

This template is a sample model COVID-19 prevention program offering considerations for churches to use during their COVID-19 prevention planning. Churches are reminded to check with their state and local government for additional guidance. Prior to implementing their plan, it is recommended that churches consult with legal counsel to ensure their plan meets specific federal, state and local requirements. (delete this section)

### Disclaimer

This form is provided as a sample for informational purposes only, and not for the purpose of providing legal advice. You should contact your attorney to obtain advice with respect to any particular contractual or legal matter as may apply in your state. Use of this form does not create an attorney-client relationship.

(delete this section)

SAMPLE

Both federal and state agencies recommend or require employers to plan for re-opening in the wake of the COVID-19 pandemic. This planning generally involves identifying risks in each specific workplace and determining control measure an organization can implement to eliminate or reduce the risk of transmission of COVID-19 at work.

### **Guidance Generally Applicable To All Churches**

Nationally, OSHA's Guidance for Preparing Workplaces for COVID-19 outlines basic steps every church can take to reduce the risk of employee exposure to COVID-19 at work. It principally suggests churches: (1) develop an Infectious Disease Preparedness and Response Plan; (2) implement basic infection prevention measures; (3) develop policies for prompt identification and isolation of sick persons; (4) develop and communicate workplace flexibilities and protections; and (5) implement engineering and administrative workplace controls. For employers of workers with medium exposure risks to COVID-19 (i.e. those with frequent or close contact to persons infected with COVID-19 but not known or suspected to be positive, including the general public), OSHA suggests use of physical barriers where feasible, offering facemasks to employees and congregants, requesting members of the public to remain away while sick, implementing measures to preserve social distancing. OSHA provides further guidance for preparedness and response plans, as well as answers to frequently asked questions, in its more general Guidance on Returning to Work. Additional resources relating to business travel, handwashing practices, face coverings and other items a church might consider including it is pandemic preparedness planning can be found in OSHA's Guidance by Industry under the "All Industries" tab.

In addition to the OSHA guidance, the CDC routinely updates its Guidance for Businesses and Employers providing additional information churches can use as they lay out protocols for symptom checking and employee screening, update policies to facilitate the isolation of sick or symptomatic employees from the workplace, institute approaches for cleaning and disinfecting the workplace, implement training for workers on COVID-19 risks and otherwise conduct thorough COVID-19 hazard assessments. Specific to churches, the CDC also publishes Guidance for Communities of Faith, which provides specific ideas for churches looking to promote healthy hygiene practices, encourage mask wearing, intensify cleaning measures, promote social distancing and undertake other measures to limit exposures during community worship.

Beyond reviewing the foregoing materials from federal agencies as they build pandemic preparedness plans, churches must be sure to check whether any existing state or local guidance or requirements impact their planning.

### **Pandemic Preparedness Planning in California**

California is one of the states with its own, robust regulatory scheme surrounding pandemic preparedness planning. Its COVID-19 Employer Playbook was codified into law at the end of 2020. The Playbook echoes continuing calls for employers to plan for a safe, clean environment for workers and congregants. In sum, the Playbook requires all facilities to do the following:

1. Perform a detailed risk assessment and create a work site-specific COVID-19 prevention plan;
2. Train workers on how to limit the spread of COVID-19, including how to screen themselves for symptoms and when to stay home;
3. Set up individual control measures and screenings;
4. Put disinfection protocols in place;
5. Establish physical distancing guidelines; and
6. Establish universal face covering requirements (with allowed exceptions) in accordance with California Department of Public Health guidelines.

The Playbook also introduces mandates for employers to notify employees and report to local health departments after certain positive COVID-19 cases occur within a facility. The Playbook also explains an employer's obligation to report a serious illness, serious injury or death arising from COVID-19 connected to work and for employer to record work-related COVID-19 fatalities and serious illnesses as required.

Beyond the general principles explained or announced in the Employer Playbook, California churches must also incorporate the specific guidance contained within COVID-19 Industry Guidance: Places of Worship and Providers of Religious Services and Cultural Ceremonies. This guidance generally follows the pandemic preparedness planning called for under the Employer Playbook while providing specific recommendations or call-outs for places of worship. Among other things, the industry guidance:

1. Prohibits indoor singing and chanting and limits such practices in outdoor settings;
2. Limits indoor attendance at services to 25% of building capacity or 100 persons, whichever is less, and recommends offering additional service times to limit the number of guests attending at a given time;
3. Requires the use of face coverings by employees and members of the public;
4. Encourages remote services and dictates workers and volunteers should not visit homes of persons who are symptomatic of or test positive for COVID-19;
5. Calls for cleaning of high-touch and high-traffic areas, including pulpits, podiums, donation boxes, alters, pews, microphones, music stands and instruments;
6. Discourages sharing items such as prayer books, cushions or prayer rugs;
7. Calls for cleaning of religious garments and linens after each service or event at the highest water setting possible;
8. Mandates discontinuing passing of offering plates and similar items which move between people (and suggests alternatives such as secure drop boxes or digital, touch-free offerings);
9. Calls for social distancing among members of different households and suggests pew markings, signage or reconfigurations of seating to insure such distancing;
10. Recommends shortening services or sermons as possible to limit time spent at facilities;
11. Recommends limiting touching for religious purposes, such as holding hands, to members of the same household and discourages handshakes, hugs and similar greetings that break physical distancing;
12. Calls for the removal of communal/religious water containers such as fonts, sinks, and vessels or replacement with low-community touch alternatives, suggests changes of water between uses and recommends protective equipment where there is a possibility of contaminant splash;
13. Suggests reconfiguring parking lots to limit distancing; and
14. Calls for discontinuing food and beverage service and modifying practices specific to particular faith traditions that would spread COVID-19 such as kissing ritual objects, offering communion by hand or through pre-packaged materials instead of on the tongue.

Finally, California churches should review the Cal-OSHA Emergency Temporary Standards on COVID-19 Infection Prevention. The Emergency Temporary Standards again emphasize the need for a COVID-19 Prevention Program which must incorporate the following:

1. Communication to employees about the employer's COVID-19 prevention procedures;
2. Identify, evaluate and correct COVID-19 hazards;
3. Physical distancing of at least six feet unless it is not possible;
4. Use of face coverings;
5. Use engineering controls, administrative controls and personal protective equipment as required to reduce transmission risk;
6. Procedures to investigate and respond to COVID-19 cases in the workplace;
7. Provide COVID-19 training to employees;
8. Provide testing to employees who are exposed to a COVID-19 case, and in the case of multiple infections or a major outbreak, implement regular workplace testing for employees in the exposed work areas;
9. Exclusion of COVID-19 cases and exposed employees from the workplace until they are no longer an infection risk;
10. Return to work criteria; and
11. Maintain records of COVID-19 cases and report serious illnesses and multiple cases to Cal/OSHA and the local health department, as required



In addition to repeating the calls for COVID-19 Prevention Programs, employee notifications and reporting of positive cases, the Emergency Temporary Standards introduce a further requirement that employers must offer testing to employees at no cost and during work hours after a potential COVID-19 work-related exposure. If a church encounters an “outbreak,” which is defined as three laboratory-confirmed cases within 14 days, it must provide such testing at least weekly until the facility no longer meets the definition of an outbreak. Churches seeking additional information can refer to Cal-OSHA’s landing page for the Emergency Temporary Standards or Frequently Asked Questions.

Churches can use the enclosed Model COVID-19 Prevention Program to build their written plan. In doing so, they should confirm whether any local requirements impact their planning.

SAMPLE

## California Model COVID-19 Prevention Program (CPP)

November 2020

*With some exceptions, all employers and places of employment are required to establish and implement an effective written COVID-19 Prevention Program (CPP) pursuant to an Emergency Temporary Standard in place for COVID-19 (California Code of Regulations (CCR), Title 8, section 3205(c)). Cal/OSHA has developed this model program to assist employers with creating their own unique CPP tailored to their workplace.*

*Employers are not required to use this program. Employers may create their own program or use another CCP template. Employers can also create a written CCP by incorporating elements of this program into their existing Injury and Illness Prevention Program (IIPP), if desired. Cal/OSHA encourages employers to engage with employees in the design, implementation and evolution of their COVID-19 Prevention Program.*

*Using this model alone does not ensure compliance with the emergency temporary standard. To use this model program effectively, the person(s) responsible for implementing the CPP should carefully review:*

- *All of the elements that may be required in the following CCR, Title 8 sections:*
  - *3205, COVID-19 Prevention*
  - *3205.1, Multiple COVID-19 Infection and COVID-19 Outbreaks*
  - *3205.2, Major COVID-19 Outbreaks*
  - *3205.3, Prevention in Employer-Provided Housing*
  - *3205.4, COVID-19 Prevention in Employer-Provided Transportation to and from Work*
  - *The four [Additional Considerations](#) provided at the end of this program to see if they are applicable to your workplace.*
- *The additional guidance materials available at [www.dir.ca.gov/dosh/coronavirus/](http://www.dir.ca.gov/dosh/coronavirus/)*