

## 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.

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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/)*