

EXHIBIT B – BUSINESS OFFICES; COMMERCIAL OFFICE BUILDINGS

PART II – COMMERCIAL OFFICE BUILDINGS

STL Regional Business Recovery Initiative

COMMERCIAL OFFICE BUILDINGS OPERATING PROTOCOLS

As the St. Louis Metropolitan Area returns to the workplace after several weeks under a Stay-At-Home order, it is critical that precautionary measures are followed to continue mitigating the spread of respiratory illness (including COVID-19).

This document provides guidelines for building owners and managers as commercial buildings prepare for a return to operating at modified capacity. The most effective tool for preventing the spread of respiratory illness (including COVID-19) is physical distancing, but there are other measures you can take to stop the spread and provide a safe space for our workforce.

The recommendations contained herein do not supersede Public Health orders, laws or regulations that apply to your business and jurisdiction.

Elimination Strategies

The most important set of strategies involve physically removing the potential of exposure. These elimination strategies include ensuring that employees quarantine or isolate if they have or are believed to have COVID-19 or have come into contact with individuals who have COVID-19. To do so, businesses should educate their employees about Disinfection Processes and Social Distancing Requirements, quarantine and isolation, regularly screen employees to see if they have come into contact with a COVID-19 positive person and insist that quarantine and isolation policies are strictly followed.

Substitution Strategies

Whenever possible, have people work or access the business from home; this should include restructuring responsibilities to minimize the numbers of employees that need to be physically present. Consider redistributing responsibilities to reduce contact between individuals and using technology to facilitate communication. For workplaces this can mean instituting work from home policies for all non-essential personnel. For essential personnel and workplaces, it can mean reducing the number of employees on a shift and keeping employees further apart.

Engineering Controls

Businesses should also implement engineering controls by creating physical barriers between people to reduce transmission. Businesses whose employees interact with the public should install physical barriers between customers and employees or otherwise use design elements to ensure six feet of distance between customers and employees, particularly in check-out lines or return-lines or any other place where there is continued contact between the customer and employee. Install clear markings with signage, tape, or other means that show six (6) feet of distance as the appropriate spacing between customers. Provide signage inside and outside the facility outlining Social Distancing Requirements, limitations on crowd size, and procedures to limit crowd size.

Administrative Controls

Administrative controls change the way employees perform their work. Businesses should implement the following administrative controls:

- **Reduce Face-to-Face Contact**
 - whenever possible, have employees work from home;
 - restructure employee responsibilities to minimize the numbers of employees that need to be physically present at any one time;
 - stagger work schedules to reduce the number of people on the premises at any one time;
 - arrange for contactless payment, pick-up, and delivery options whenever feasible and provide postings as to the availability of such services;
- **Frequent Sanitation**
 - require frequent sanitation of all high touch surfaces, such as restrooms, shared computers, check-out areas, carts, baskets, and any other areas that may be frequently touched by customers, employees, or any other individuals;
 - provide breaks for employees for hand washing or sanitizing opportunities throughout the day;
 - prohibit customers from bringing outside containers, including reusable bags or boxes, into the facility;
- **Require Face Coverings**
 - provide face masks or supplies to make face masks to all employees or volunteers working in their facilities;
 - require employees or volunteers to wear face masks at work, unless the employee or volunteer is working alone in an enclosed area;
- **Regular Screening**
 - identify employees and volunteers who are potentially ill through daily screening for symptoms;
- **Manage Crowds**
 - limit the number of employees, customers, and other people who are permitted to be in the facility at any one time so that each of them can follow social distancing practices;

- in all areas which are prone to lines or congregation, install clear markings with signage, tape, or other means that show six feet of distance as the appropriate spacing between customers;
- **Protect the Vulnerable**
 - establish hours of operation, wherever possible, for individuals at high-risk of experiencing adverse outcomes from respiratory illness (including COVID-19);

Protective Equipment

Use of protective equipment is an effective risk mitigation strategy. Distribution of protective equipment means that workers use face coverings, and, in some situations, gloves.

Additional Considerations

Whenever possible, have people work or access the business from home; this should include restructuring responsibilities to minimize the numbers of employees that need to be physically present. Consider the questions below:

- Are you able to reduce the number of employees who are public facing?
- Are you able to have the same consistent employee(s) be public facing?
- Are you able to conduct your business with a reduced number of people on site?
- Do you have an adequate supply of and capacity to provide hand sanitizing stations, soap, and paper towels for employees and consumers?
- How will you implement sanitizing and disinfection of workspaces?
- Which staff member will be responsible for monitoring this?
- Are there restricted points of entrance and exit that force people to be in close proximity and/or pass through high-touch areas (e.g. turnstiles, fingerprint entry, doors and elevators)?

Resources:

The Centers for Disease Control and Prevention: Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19).

<https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>

Occupational Safety and Health Administration: Guidance on Preparing Workplaces for COVID-19. <https://www.osha.gov/Publications/OSHA3990.pdf>

Regardless of business specific considerations, there are measures that must be taken to mitigate the risk of infection to protect individuals:

- Use of nonmedical cloth masks
- Incorporating engineering controls such as physical barriers where possible.
- Reconfiguring space to comply with Social Distancing Requirements by ensuring people are able to maintain 6 ft. of distance from each other.

- Supporting and enabling employees to remain at home if they are unwell or have been in close contact with someone who is sick.
- Must frequently sanitize and disinfect, with EPA-approved products, all high touch areas and surfaces that are touched by customers, employees, visitors, or any other individuals.
- Shall train employees about procedures related to Disinfection Processes and Social Distancing Requirements.
- Shall provide employees working in the building/facility with face coverings or supplies to make face coverings.
- Shall require employees to wear face coverings while at work, unless the employee is working alone in an enclosed area or has a medical reason not to wear a face covering.
- Shall provide reasonable breaks for employees to wash their hands.
- Shall conduct daily screening of employees who work in their building/facility for symptoms of COVID-19.
- Require employees to quarantine or isolate if they have or are believed to have COVID-19, or if they have come into contact with individual(s) with COVID-19.
- Staying current on federal, state, and local mandates and recommendations, and guidelines from the CDC.

Phased Re-Entry

- St. Louis City/County guidelines require 6-foot distancing among employees and encourages telework where feasible.
- In early stages of the lift from Stay-At-Home orders, measures should be taken to minimize the number of people in the workplace, especially common areas, at one time.
- Tenants should stage the return of their employees so that not everyone is coming into the office at the same time, or even on the same days.
- Building managers are encouraged to survey tenants to determine their plan for re-entry, determine peak hours for entrance and exit, and stagger start and stop times when necessary with those tenants who are willing to do so.

Building Entry & Security

- Strategically post signs promoting social distancing per CDC guidelines at building entrances, lobby, security desk, parking facilities, loading docks, and amenity centers.
- Minimize open entrances, or designate doors for ingress and egress to help regulate number of people gathered at exterior doorways.
- Consider implementing a clockwise or counterclockwise traffic flow, reinforced by stations. This prevents people from crossing paths when entering and exiting and catalyzes social distancing.
- Require cloth masks in common areas according to executive orders. Interior and exterior signs must clearly indicate this policy.
- Consider labeling floors at security for staging of visitors, if applicable.
- Install transparent dividers at reception and security desks.
- Label floors at security desks, reception desks, and at elevators to indicate 6-foot distancing.
- If applicable, determine protocol for tenants who have lost their ID. Consider waiting outside or at a predetermined location while their company designated escort arrives.

- Security officer(s) should be trained to politely and firmly encourage tenants to maintain 6 feet distancing and mask protocol. Be clear as to protocol around dissent.

Employee Arrival & Departure

- Upon arrival at work, employees should be masked, and employers must conduct health checks (e.g., temperature and symptom screening) of employees at the start of each shift. Conduct health checks safely and respectfully, and in accordance with any applicable privacy laws and regulations. Confidentiality should be respected. Employers may use examples of screening methods in CDC's General Business FAQs as a guide.
 - Symptoms of COVID-19 include fever, cough, shortness of breath or trouble breathing, muscle aches, sore throat and new loss of taste or smell.
 - Screening should include 1) a temperature check if it can be performed with a touchless thermometer, 2) asking about the presence of new or worsened cough, shortness of breath or trouble breathing, fever, chills, muscle aches, sore throat, new loss of taste or smell and 3) asking if the employee has had close contact with a person diagnosed with COVID-19 in the past 14 days.
 - Employees with a temperature of 100.4°F (38°C) or above, or who answer yes to any of the screening questions must not be allowed to enter the workplace. Employees who develop any symptoms of respiratory illness while at work must immediately be sent home. Employees with symptoms should contact their healthcare provider for additional guidance.
 - Employees who are sent home with symptoms should not return to work until they have met CDC's criteria to discontinue home isolation or they have been cleared to return by their healthcare provider.
- If an employee is diagnosed with COVID-19, work with local health agencies to ensure all employees and customers who can be identified as having had close contact while the employee was infectious are contacted. While awaiting formal investigation, compile a list of employees, customers, or other people known to be in close contact with the person diagnosed with COVID-19. Employees identified as having close contact should be immediately sent home or told not to come into work until the investigation has been conducted.
- Close off areas recently used by an employee or customer who has tested positive for COVID-19 and do not reuse them until after cleaning and disinfection. Wait 24 hours before cleaning and disinfecting. If it is not possible to wait 24 hours, wait as long as possible. Ensure safe and correct application of disinfectants.
- Covered employers and employees should be aware of the provisions of the federal Families First Coronavirus Response Act, which allows for paid sick leave or expanded family and medical leave for specified reasons, such as for self-quarantining or seeking a medical diagnosis for COVID-19 symptoms.
- Staff should always wash hands when arriving at and before leaving the worksite using warm water (at least 100°F) and soap for at least 20 seconds. Hand washing should be repeated after any of the following activities: using restrooms, sneezing, touching the face, blowing the nose, cleaning, sweeping, mopping, eating or drinking. When hand washing is not possible, alcohol-based hand sanitizer containing at least 70% alcohol may also be used.

Visitor Protocol for Secure Buildings

- Tenant visitor protocol should be updated or established. For example, tenants shall provide a "LIST OF VISITORS" in advance to building management via email or visitor management system outlining visitor NAME and estimated TIME OF ARRIVAL.
- Clearly communicate procedures to tenants and ensure tenants provide their visitors with a phone number to call in the event of an anomaly.
- Tenants should inform their visitors of procedures in advance of visit to diffuse potential misunderstandings and negative experiences.
- Recommend tenants limit the number of guests as the building adjusts to re-entry to comply with the requirement for gatherings to be no larger than 10 people.
- Ensure security guards and daytime building staff are informed of protocol. Security guards should have step-by-step instructions.

Elevators/Elevator Lobbies

- Signs encouraging social distancing should be displayed in elevator lobbies in highly visible areas, including tenants' elevator corridors on each floor.
- Limit number of people in an elevator to 2-3, depending on the size of the elevator. Encourage elevator occupants to disperse among the four corners of the cab.
- Post signage in the cabs and floor markings indicating where tenants should stand.
- Encourage the use of touchless door openers and button pushing tools to prevent contact with buttons and door handles.
- Hand sanitizing stations should be placed in elevator banks and tenants are to be encouraged to sanitize hands prior to, and after, touching elevator call pads.
- Promote use of stairwells, where accessible.

Hallways & Stairways

- Post signs to promote social distancing and designate path of travel; staying to the right.
- If stairwells are accessible, and where there is more than one accessible stairwell, designate one stairwell for traffic going up, and one for traffic going down.
- Prepare for more frequent and thorough cleaning and disinfecting of stairwells and handrails.

Restrooms

- Post social distancing signage throughout restrooms.
- Block use of center sink to separate people at handwashing stations.
- Post signage designating proper handwashing technique.
- Utilize decals on the floor to promote distancing.
- Install paper towel dispensers at restroom doors and waste receptacles outside for door opening.
- Provide adequate soap and water, and if possible, provide hand-sanitizer stations at hallway entrance to the restroom to allow for cleaning hands before and after touching the door handle.

Amenity Spaces

- Institute temporary closures-within common/amenity areas such as gyms, lounges, game rooms, etc., until further notice.
- Remove or relocate chairs to maintain 6-foot distance in common areas.
- Establish increased common area/amenity cleaning protocol with specific instructions. Building cleaning staff should be visible throughout the workday to build tenant confidence in safety protocols.

Conference Centers

- Gathering of 10 or fewer are permitted in this phase.
- Establish protocol for conference areas to ensure social distancing.
- Conference centers must be stocked with disinfectant wipes with adequate time allotted for appropriate cleaning between uses. Enlist tenants to wipe down conference areas after use.
- Reconfigure conference center tables and chairs to accommodate 6 feet of space between participants.
- Limit conference room capacity to accommodate configuration with 6-foot distancing.
- Place signage on conference tables encouraging the practice of safe distancing.

Cafeterias & Eateries

- All guidelines contained in the Restaurant Operating Protocols must be adhered to.

Promote Tenant Responsibility

- Tenants must report any positive cases of COVID-19 to building management. Personal identification of the individual will not be required.
- Building management should provide frequent and thorough communication to enlist senior leadership of office tenants in enforcing policies and reducing confusion.
- Encourage tenants to perform temperature or thermal scanning for their offices and require employees who are symptomatic, or have a temperature of 100.4 degrees or higher, to leave the premises.
- Encourage tenants to develop their own protocols internally around conference room uses, coffee/lunch areas, phone booths, and shared workstations