

## EXHIBIT B – BUSINESS OFFICES; COMMERCIAL OFFICE BUILDINGS

### PART I – BUSINESS OFFICES

# STL Regional Business Recovery Initiative

## **BUSINESS OFFICES 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 COVID-19.

This document provides guidelines for business leaders as they prepare for their staff to return to the workplace. The most effective tool for preventing the spread of the COVID-19 virus is physical distancing, but there are other measures you can take to stop the spread and provide a safe space for your employees.

**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 practices, 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 with COVID-19 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 COVID-19;

### **Protective Equipment**

Use of protective equipment is an effective risk mitigation strategy. Distribution of personal 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 Return of Employees**

- Employers must implement social distancing measures for employees and customers (i.e. at least 6 feet of distance between individuals) and encourage 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. For any size gathering, social distancing measures must be followed.
- Consider staging the return of your employees so that not everyone is coming into the office at the same time, or even on the same days.
- Consider providing separate operating hours for vulnerable populations and high-risk individuals to allow for maximum social distancing.
- Allow telework where feasible.

### **Office Entry**

- Strategically post signs promoting social distancing per CDC guidelines at office entrances/exits, lobby, and break areas.
- If you have more than one outside door to your office, designate doors for ingress and egress to help regulate number of people gathered at exterior doorways.
- Require cloth masks in accordance with St. Louis City/County guidelines. Interior and exterior signs should clearly indicate this policy.
- Install transparent dividers at your reception desk.
- Label the floor at your reception desks to indicate 6-foot distancing.

### **Employee Screening & Reporting**

- 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.
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- 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.

### **Visitor Protocol**

- Do not allow non-essential visitors during initial re-entry to maintain social distancing guidelines.
- Advise visitors of screening, social distancing, and face covering policies for the building and your office through posted signage.

### **Protective Equipment**

- Face coverings must be worn by all persons at all times unless working alone in an enclosed space.

- Provide face coverings, or supplies to make face coverings, to all employees and volunteers working in the business. Consult [CDC guidelines](#) for information on face masks.

### **Workspace Sanitation & Hygiene**

- Provide breaks for employees to wash hands and sanitize their workspace throughout the day.
- Stock your office with hand sanitizer and disinfectant wipes, allowing adequate time for appropriate cleaning between uses of conference rooms.
- Discourage sharing of equipment such as phones and keyboards.

### **Common Spaces**

- Consider temporary closure or mandatory distancing within common/amenity areas such as lounge areas.
- Remove or relocate chairs to maintain 6-foot distance in common areas.
- Establish increased common area cleaning protocol with specific instructions. Have hand sanitizer and disinfectant wipes readily available.

### **Conference Rooms**

- Groups of no more than 10 people are permitted to gather during this phase.
- Establish protocol for conference areas to ensure social distancing.
- Conference rooms should be stocked with disinfectant wipes with adequate time allotted for appropriate cleaning between uses.
- Reconfigure conference room 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.

### **Kitchenette & Break Areas**

- Establish protocol for kitchenette and break areas to ensure social distancing.
- These areas should be stocked with disinfectant wipes and signs promoting proper handwashing.
- Reconfigure dining tables and chairs to accommodate proper distancing. Co-workers should not take breaks or eat meals with other co-workers.
- Train employees and post signage to discourage co-workers from congregating in communal areas.

## **Promote Individual Responsibility**

- Employees should be empowered and required to stay home if they are sick, symptomatic, or exposed to someone who has tested positive for COVID-19.
- Remind employees of their social responsibility to protect themselves and others by following protocols for minimizing risk to infection.
- Encourage tenants to develop their own protocols internally around conference room uses, coffee/lunch areas, phone booths, and shared workstations