
Considerations for CASA / GAL Organizations



LOGISTICAL AND OPERATIONAL CONSIDERATIONS IN RE-OPENING OFFICES AFTER AUTHORITIES LIFT COVID-19 STAY-AT-HOME ORDERS

We are providing consideration to a number of functions in light of the coronavirus (COVID – 19). This document focuses on topics that organizations may consider when deciding if and how to re-open their offices after authorities lift COVID-19 stay-at-home orders.

GOVERNMENT ORDERS AND GUIDANCE

Organizations should, first and foremost, follow the orders and guidance of their government authorities about re-opening their offices. Generally speaking, authorities have taken a phased approach to re-opening, allowing some workplaces to open earlier than others, and imposing more restrictions in the early phases. In light of this approach, CASA/GAL state organizations and local programs may need to open with limited operations and gradually open up offices to more staff and visitors over time. The authorities may require use of face masks, social distancing, screening, testing, contact tracing, and other measures, even when offices re-open. This document explores some of the issues related to complying with the re-opening orders and guidance from government authorities.

INFECTIONS IN THE WORKPLACE

CASA/GAL organizations will want to take appropriate actions to prevent infections in the workplace. While workers compensation insurance will likely cover COVID-19 infections in the workplace, employers might also face lawsuits by employees who become infected. To reduce the risk of infection and thereby limit liability in such lawsuits, an employer may follow [Occupational Safety and Health Administration guidance on workplace preparedness](#) and other government orders and guidance, develop policies and protocols about access to and use of the space (including number of people allowed in) and personal protective equipment (such as masks), provide necessary supplies, and communicate and provide training on the policies and protocols. Because of the risk inherent in these decisions,

the CASA/GAL may want to review its infection control plan and the screening, testing, and contact tracing approach with its governing body.

CASA/GAL organizations may want to pay more attention to three knottier topics relating to infection control, namely (1) higher risk groups; (2) screening, testing, and contact tracing; (3) volunteers and other visitors. The remainder of this section provides more in-depth discussion on these topics.

Higher Risk Groups

The Centers for Disease Control (“CDC”) have identified certain [groups of people with higher risk for severe illness](#) should they become infected with COVID-19. The U.S. Equal Employment Opportunity Commission (“EEOC”) has issued [guidance](#) about providing reasonable accommodations to people in higher risk categories, as well as privacy issues regarding those accommodations. Consistent with this guidance, as well as guidance from state and local authorities, employers might ask or require people in those groups to remain out of the workplace until normal operations fully resume.

Screening, Testing, and Contact Tracing

CASA/GAL organizations should consider how they will handle screening (taking temperatures and asking questions about [symptoms identified by the CDC](#) or contact with people with symptoms or a diagnosis), testing (diagnostic [current infection] and serological [past infection]), and contact tracing (identifying people who have come in contact with sick people). In some jurisdictions, government authorities do not require any screening, testing, or contact tracing, while in others the authorities require those steps only after a positive diagnosis in the workplace, and still others require proactive steps. Each CASA/GAL organization can look to [EEOC guidance](#) and state and local orders to develop an approach that aligns with its particular circumstances.

In developing its approach to screening, testing, and contact tracing, the CASA/GAL organization may consider the following issues.

- Obligations under government orders
- Protocols of building management
- Availability of necessary supplies
- Whether employees will do self-screening at home or someone will screen them at the workplace
- Who will conduct screening, tests, and contact tracing – an employee or a service provider

Volunteers and Other Visitors

Depending on the size and layout of the workspace, the CASA/GAL organization may consider restricting or limiting non-employee access to the office. If volunteers normally come to the office for trainings, meetings with supervisors, or case meetings, the CASA/GAL program will need to assess if those can happen in-person in a way that respects proper social distancing and the guidance from the authorities.

BUILDING MANAGEMENT

The policies and protocols of building management for operations in each phase of re-opening may determine how the CASA/GAL organization can operate in its workspace. Topics of discussion with building management include the following.

- Hours of operation
- Restricted access to entrances, exits, parking, and storage areas
- Protocols and signage to enable social distancing in common areas, such as parking lots and garages, lobbies, elevators, stairs, hallways, bathrooms, kiosks, and meeting rooms
- Security protocols
- Screening, testing, and contact tracing by the building
- Protocols for people with symptoms or diagnosis who have entered the building
- De-contamination and cleaning protocols by the building
- Effectiveness of building ventilation in circulating out air and any changes building management will make to ventilation systems

OFFICE SPACE

As each organization assesses the readiness of its own space prior to re-opening, it may consider making physical changes and alter its operations in order to limit the risk of infection. If the CASA/GAL organization shares space with other tenants, they will need to figure out together how to use the space. In assessing the readiness of the space, the CASA/GAL organization may consider the following issues.

- De-contamination and cleaning protocols within the office

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- Initial de-contamination and cleaning before opening
 - Setting the ongoing schedule and protocols with the cleaning service
 - Availability of sufficient quantities of cloth masks, gloves, cleaning and disinfecting supplies (see [EPA disinfectant guidelines](#)), and other supplies necessary to keep the office prepared
 - Layout of the office
 - Work spaces
 - Ensure six feet of separation
 - Consider installing dividers, leaving desks empty, moving furniture, or blocking off parts of furniture
 - Traffic flows
 - Identify any blind spots, bottlenecks or areas where people will likely cross paths
 - Tell staff to take care at these spots, or
 - Put up signs to direct traffic flows or warn people of the tight area
 - Shared spaces (kitchen areas, break rooms, meeting rooms)
 - Determine if and how staff can access shared spaces safely
 - Use signage to advise people how to enter, exit, navigate, and use these spaces to minimize contact
 - Post [CDC Wash Your Hands sign](#) above sinks
 - Ingress and egress options
 - Consider designating certain doors as enter-only and others as exit-only in order to avoid people crossing paths at those doors
 - Post [CDC Wash Your Hands sign](#), [CDC Stop the Spread of Germs sign](#) and [CDC Screening Questions sign](#) on entrances

- Assess current emergency exit routes and, if those need to change with any layout changes to the office, mark them as necessary
- Note any high-touch areas that will need extra cleaning and disinfection.
 - Doors
 - Light switches
 - Cabinets
 - Drawers
 - Printer/copiers
 - Remote controls
 - Shared computers, in particular keyboards and mice (such as in postage and conference rooms)

POLICIES AND PROTOCOLS

CASA/GAL organizations may consider developing policies and protocols relevant to this next phase of the COVID-19 crisis. Topics of possible policies and protocols include the following.

- Operations
- Addressing Potential COVID-19 Infections
- Business Travel

You will find examples for these policies at the end of this guidance.

National CASA/GAL does not require that members have any of these particular policies, that a policy use the particular language in the examples, or that a policy cover the points raised in the examples. If the organization decides to have these policies, it may use these examples to help it consider various issues, but it should draft policies that meet the particular needs of the organization, and follow direction from government authorities, building management, and the governing body.

COMMUNICATIONS AND TRAINING

CASA/GAL organizations will want to communicate their policies and protocols to staff and also communicate any new operational information to supporters, volunteers, board members, frequent visitors, and others who might visit the space.

The organization might consider getting training for employees on proper use of PPE as well as cleaning in the office.

EXAMPLE Interim Operations Policy

For discussion purposes only. National CASA/GAL does not require that members have an interim operations policy, that it use this particular language, or that it cover these points. If the organization decides to have an interim operations policy, it may use this example to help it consider various issues, but it should draft a policy that meets the particular needs of the organization, and follows direction from the authorities, building management, and the governing body.

In response to the COVID-19 pandemic, [CASA/GAL Organization] has adopted the following interim operations policy in order to protect employees and contract workers.

1. All employees have the option of working from home. Individuals who belong to one of the categories identified by the Centers for Disease Control (“CDC”) as higher risk must work from home. As of the issuance of this policy, the CDC has identified the following higher risk groups:
 - People 65 years and older
 - People who live in a nursing home or long-term care facility
 - People of all ages with underlying medical conditions, particularly if not well controlled, including:
 - People with chronic lung disease or moderate to severe asthma
 - People who have serious heart conditions
 - People who are immunocompromised
 - Many conditions can cause a person to be immunocompromised, including cancer treatment, smoking, bone marrow or organ transplantation, immune deficiencies, poorly controlled HIV or AIDS, and prolonged use of corticosteroids and other immune weakening medications
 - People with severe obesity (body mass index [BMI] of 40 or higher)
 - People with diabetes
 - People with chronic kidney disease undergoing dialysis
 - People with liver disease
2. Employees and contract workers must wear cloth masks in public, including common areas of the building. Employees and contract workers do not need to wear cloth masks in the office as long as they remain at least six feet away from everyone else in the office and otherwise engage in proper social distancing.
3. Employees and contract workers must wash their hands upon entering the office and frequently throughout the day, following CDC guidance on hand washing.

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4. Employees and contract workers must stay six feet apart from other people while in the office. This means that people may not shake hands or hug in the office. Employees and contract workers may need to move workstations, stagger schedules, or telework in order to comply with this requirement.
 5. Employees and contract workers must follow all signs about directional flow, and use restrictions for particular areas of the office.
 6. Employees and contract workers shall not use each other's phones, keyboards, or other equipment.
 7. Only one person may use the kitchen area at any time. After using the kitchen area, that person must wipe down anything she or he touched (e.g., items in the refrigerator, coffee maker, refrigerator, microwave, toaster, cabinets, utensils, plates, etc.). Before leaving the kitchen area, that person must wash his or her hands.
 8. All meetings at the office will take place via video conference. Employees and contract workers may attend court hearings or essential meetings or events outside the office as long as those gatherings comply with all emergency declarations and the employee or contract worker can maintain proper social distancing, including staying at least six feet away from other people. Employees and contract workers must wear cloth masks at those gatherings and should wear other personal protective equipment as appropriate.
 9. At the beginning and end of each work day each employee or contract worker must clean her or his workspace, including door handles, cabinets, phone, headset, keyboard, and mouse.
 10. [CASA/GAL Organization] will not allow visitors, including volunteers, in the office. Deliveries can be left outside the front door. In the rare instances that the employee or contract worker needs to meet someone in person, he or she can arrange to meet in the lobby of the building or in another public space. In those meetings the employee or contract worker must stay at least six feet away from other people and must wear a cloth mask, as well as other personal protective equipment as appropriate.

EXAMPLE Interim Policy for Addressing Potential COVID-19 Infections among Employees and People in the Office

For discussion purposes only. National CASA/GAL does not require that members have an interim policy for potential COVID-19 infections, that it use this particular language, or that it cover these points. If the organization decides to have an interim policy for potential COVID-19 infections, it may use this example to help it consider various issues, but it should draft a policy that meets the particular needs of the organization, and follows direction from the authorities, building management, and the governing body.

In response to the COVID-19 pandemic, [CASA/GAL Organization] has adopted the following interim policy for addressing potential COVID-19 infections among employees and people in the office.

1. **Worker Self-Monitoring.** All employees and contract workers shall self-monitor for signs and symptoms of COVID-19, which as of the issuance of this policy, the Centers for Disease Control identified as follows:
 - fever over 100.4 degrees Fahrenheit
 - cough
 - shortness of breath
 - chills
 - repeated shaking with chills
 - muscle pain
 - headache
 - sore throat
 - new loss of taste or smell
 - persistent pain or pressure in the chest
 - new confusion or inability to arouse
 - bluish lips or face

Each employee or contract worker must take his or her temperature before coming into the office. If an employee or contract worker has a temperature over 100.4 degrees Fahrenheit or any COVID-19 symptoms, the worker shall not come into the office. Instead, the worker should call a medical professional immediately.

If an employee or contract worker who normally works from the office reports in sick, the supervisor shall ask if she or he has COVID-19 symptoms. If the worker has those symptoms, she or he should call a medical professional immediately and the supervisor shall inform human resources, but no one else.

2. **Testing and temperature.** Employees and contract workers shall comply with any requirements by public health officials to have a COVID-19 test or their temperature taken before entering the office.

3. **Worker Develops Symptoms.** If an employee or contract worker develops symptoms or receives a diagnosis of COVID-19, he or she should inform human resources as soon as possible. Human resources should take the following steps:

- Notify worker's compensation carrier for any covered employees
- Place a covered employee on paid workers' compensation leave
- Record the infection in the OSHA 300 log, or a similar form
- Notify the worker's supervisor that the worker has taken a leave of absence for non-disciplinary purposes. Do not provide further details or inform other workers unless directed by the authorities
- Store any information about a worker's suspected or actual COVID-19 case in a separate file (not the personnel file)
- Notify local public health authorities of the name of the worker and the report of symptoms or diagnosis. Follow any guidance from them

4. **Symptoms Develop at the Office.** If a worker or guest in the office develops symptoms or receives a diagnosis of COVID-19 while at the office, he or she should inform the executive director, who will take the following steps.

- (1) Stay six feet away at all times and direct the person with symptoms to isolate in a room with a door, or other space away from others. No one else should go in the room. Everyone else should stay six feet away.
- (2) Put on face mask. Provide a face mask for the person with symptoms.
- (3) Check on the person's condition. If you do not know him or her, introduce yourself. Get the name and phone number of the person with symptoms. Slide your business card under the door and ask the person to take it.
- (4) Ask if the person can call his or her doctor or another medical professional. If the person cannot call, ask for permission to call the doctor's office. If the person does not grant permission or does not have a doctor or know the doctor's name, call the local COVID-19 hotline.

The person with symptoms should discuss with the medical professionals where he or she will go and how he or she will get there. If the person needs an ambulance, the medical professionals should arrange for one to come.

- (5) Contact building management to advise of the situation.

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- (6) Advise others in the office of the situation and direct them to gather their things and leave, safely.
 - (7) Find out where the person has gone in the building and in the office. Ask the person to narrate their path through the building. Ask specifically about bathrooms, parking, elevators, stairways, lobbies, and any merchants. The person should identify all people he or she saw during his or her time in the building.
 - (8) Put on PPE if necessary. Err on the side of safety.
 - (9) Communicate the exit plan to the person with symptoms. You will not escort the person with symptoms out of the office.
 - (10) If the person will leave by ambulance, meet the EMT to discuss the situation. Give the EMT the name and phone number of the person with symptoms as well as the contact information of the human resources representative. Take the name of the EMT and the ambulance company. Ask the EMT for directions for others in the office who might have had contact with the person with symptoms.
 - (11) Inform building management of the path the person with symptoms took while in the building and the people he or she encountered so that they can mark off and clean those areas.
 - (12) Keep people away from the isolation room and any other areas in the office where the person went. Coordinate with a qualified cleaning company to clean and disinfect the office.
 - (13) Check the office to make sure everyone has left.
 - (14) Wash hands. Go home, safely. Monitor for symptoms.
 - (15) Follow up with others in the office to give them an update (without giving personal information of the person with symptoms) and any directions for self-isolation per the guidance of the EMT or public health authorities.

EXAMPLE Interim Business Travel Policy

For discussion purposes only. National CASA/GAL does not require that members have an interim business travel policy, that it use this particular language, or that it cover these points. If the organization decides to have an interim business travel policy, it may use this example to help it consider various issues, but it should draft a policy that meets the particular needs of the organization, and follows direction from the authorities and the governing body.

In response to the COVID-19 pandemic, [CASA/GAL Organization] has adopted the following interim business travel policy.

1. Employees, contract workers, board members, and volunteers may not engage in any travel out of the state for or on behalf of [CASA/GAL Organization]. [CASA/GAL Organization] strongly discourages any exceptions to this policy. If an employee, contract worker, board member, or volunteer believes an essential business need justifies travel, she or he must submit an exception request to the executive director and board of directors with the following information:
 - a. Explanation of the need
 - b. Budget
 - c. Specific itinerary, including locations of any meetings or events and identities of people the person will see
 - d. Reasons why the person cannot delay the trip
 - e. Reasons why the person cannot use email, telephone, or videoconference to take care of the need
 - f. Protocols the person will take to engage in social distancing and remain safe and healthy
 - g. Protocols the person will take to self-quarantine upon return from the trip, work plans during the self-quarantine, and contingency plans if the person cannot return from the trip or becomes ill

The board of directors has total discretion to decline or grant an exception and allow the business travel. For requests by anyone other than the executive director, the board of directors may delegate authority to the executive director to decide whether to grant an exception.

2. [CASA/GAL Organization] asks all employees and contract workers to report any non-business travel taken fourteen days or less before returning to the office, or any time after returning to the office, in order to assess whether the worker needs to home isolate. The worker does not need to report the purpose of the trip, but should identify the places visited and any gatherings the worker engaged in. If the worker has traveled, [CASA/GAL Organization] may require her or him to remain at home or obtain a COVID-19 test before returning to the office.