**Sample COVID-19 Prevention Plan for Re-opening a California Real Estate Office**

**(updated 3.26.21)**

[Insert company name] has established this COVID-19 Prevention Plan based upon the information contained in “**COVID-19 Industry Guidance: Real Estate Transactions**” (https://files.covid19.ca.gov/pdf/guidance-real-estate--en.pdf) released by the State of California. While this Plan addresses our company’s COVID-19 prevention processes, we understand there are additional requirements to be considered for persons who are more vulnerable to COVID-19 infection. For example, certain groups including persons 65 years and older and persons with underlying medical conditions such as heart or lung disease or diabetes have a higher risk of hospitalization and serious complications due to COVID-19. Accordingly, our company’s processes may be modified in some cases, as appropriate, in order to maintain the overall goals of preventing illness in the workplace and halting spread of COVID-19 in the community.

Our company continues to keep apprised of changes to the State of California’s Industry Guidance and **Checklist for Real Estate Transactions** (https://files.covid19.ca.gov/pdf/checklist-real-estate--en.pdf) in addition to standards for compliance under our county’s health orders, Cal/OSHA, the Centers for Disease Control and Prevention (CDC), and the California Department of Public Health (CDPH).

**Required Use of Face Coverings**

This Plan incorporates the CDPH’s “**Guidance on the Use of Face Coverings**” updated 11/16/20. (https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/guidance-for-face-coverings.aspx). Our company will provide face coverings to workers or reimburse workers for the reasonable cost of obtaining face coverings when needed while working. The company has an accommodation policy for workers who need an exemption from wearing a face covering, e.g., due to a medical condition. (See Exhibit E). The company also has developed policies on its face coverings requirement and how to handle exemptions for clients, customers, visitors, and other members of the public who may visit the company’s office workplace or personally interact with Company workers when they are working off-site. (See Exhibit F).

**1.** The contact information for our local health department to communicate about any COVID-19 outbreaks among employees is listed here:

[Insert phone number, address, email address of local health department]. (You can find the contact information for your county here):

<https://www.cdph.ca.gov/Pages/LocalHealthServicesAndOffices.aspx>)

**2.** Addresses for each of our office locations are listed here, with contact information for the person(s) in our company who will implement our company’s COVID-19 Prevention Plan:

[Insert physical office address, name, email address and phone number of designated person(s) who will implement this Plan]

**3.** For each of our company’s office locations, we have identified the following work areas:

[Include description of work areas. Example: 123 Main Street, El Segundo office has 6 work areas (reception desk, administrative staffs’ cubicle area, IT group’s area, and 3 private offices)]

**4.** The company performed a comprehensive COVID-19 risk assessment of each of the above-described work areas to identify any items to be corrected to help prevent the spread of COVID-19. The items we identified are documented on **Exhibit A** with a description and date. The risk assessment for each of our offices was performed on the below date:

[Insert office address and date of risk assessment; Example: 123 Main Street, El Segundo risk assessment completed on 3/12/21); See **Exhibit A** for description of action items]

The company will continue to evaluate the office work areas on a regular basis for compliance with this Plan and current guidelines and will correct deficiencies when identified.

**[Optional: The next date for evaluation is: \_\_\_\_\_\_\_\_\_, 2021]**

**5.** Training for real estate licensees and our company employees on COVID-19 prevention was provided as of **[insert date]** through **[describe training class or insert link to training].** Training included the topics and information described in **Exhibit B**. All those who will be using the workplace premises and all new hires and new real estate licensees will receive COVID-19 prevention training before using and entering the workplace premises. Whether or not the listed workplaces are used by the employees or real estate licensees, all must comply with the protocol for showing properties as determined by local and state authorities.

[Insert date of Training(s); Example: “Employee training for real estate licensees and employees at 123 Main Street, El Segundo completed via videoconference on March 12, 2021”]

**6.** The company has established a written COVID-19 prevention plan for real estate licensees who show properties, which can be accessed here: ­­­­­­­­­­­­­­­**[insert link; may use the C.A.R. BPPP Form “Mandatory Government Showing Requirements, including Best Practices Guidelines and Prevention Plan”]**. Real estate licensees have been provided with the C.A.R. “Mandatory Government Showing Requirements, including Best Practices Guidelines and Prevention Plan” and the State’s Industry Guidelines for showing properties: <https://covid19.ca.gov/pdf/guidance-real-estate.pdf>

**7.** The company is implementing California’s guidelines for “**Individual Control Measures and Screening**.” Therefore, the company’s COVID-19 Prevention Plan includes the following:

* 1. The company may provide temperature and/or symptom screenings for all workers at the beginning of their shift (or before they enter the company’s office) and for any personnel entering the office. The screener will avoid close contact with the person being screened, to the extent possible and both will wear face coverings for the screening. Alternatively, the company may require self-screening at home, which is an appropriate alternative to providing it at the office; and will take steps to ensure that screening was performed prior to the worker leaving home for their shift and follows CDC guidelines.
  2. The company encourages workers and customers who are sick or exhibiting symptoms of COVID-19 to stay home.
  3. The company will provide and ensure workers use all required protective equipment, including face coverings, eye protection and gloves where necessary.
  4. The company will consider where disposable glove use may be helpful to supplement frequent handwashing or use of hand sanitizer; for example, for workers who are screening others for symptoms or handling commonly touched items.
  5. The company, brokers, and real estate licensees must take reasonable measures, including posting signage in strategic and highly-visible locations and in reservation confirmations, to remind clients that they must use face coverings and practice physical distancing, and should frequently wash their hands with soap for at least 20 seconds, use hand sanitizer, and not touch their face when viewing a property in person.
  6. Guests should be reminded in advance to bring a face covering and the company will make face coverings available to anyone who arrives without one, if possible.

**8.** The company has planned and made suitable arrangements to follow **Cleaning and Disinfecting Protocols**, listed in **Exhibit C**.

**9.** If the company becomes aware of a COVID-19 illness at the workplace, it will take the following steps:

* 1. **Report** the information to our local health department.
  2. **Investigate** the COVID-19 illness and determine if any work-related factors could have contributed to the risk of COVID-19 infection and Implement the necessary processes and protocols when a workplace has an outbreak, in accordance with CDPH guidelines <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Workplace-Outbreak-Employer-Guidance.aspx>
  3. **Identify** close contacts (within six feet for 15 minutes or more) of an infected person and take steps to isolate COVID-19 positive person(s) and close contacts.
  4. **Update** the company’s COVID-19 Prevention Plan as needed to prevent further cases of COVID-19 infection.
  5. **Follow**  the AB 685 Notification to Employees About Potential Exposure to COVID-19 procedures, when applicable. See: https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Employer-Guidance-on-AB-685-Definitions.aspx

**10.**  The company has reviewed current “**Physical Distancing Guidelines**” that are listed in **Exhibit D** and taken actions necessary and/or appropriate based on the company and its worksite(s).

**11.** This COVID-19 Prevention Plan will be reviewed regularly to check for any necessary updates. **[OPTIONAL—insert reminder date here for next review]**

**Exhibit A: Items Identified to Help Prevent COVID-19 Infections**

**and Actions Taken by Company**

**[Insert Office Location, Date of Action, Description]** Example: 123 Main Street, El Segundo: On March 15, 2021, Company installed plexiglass barrier at receptionist’s desk; removed 5 chairs from meeting room to decrease capacity and allow for 6 feet of space between employees; posted sign by elevator limiting number of individuals riding in elevator and reminding employees to use face coverings and wash hands.

**Exhibit B: Training on COVID-19 Prevention**

**(Per 7.29.20 California Industry Guidance—continue checking for updates)**

Training on COVID-19 prevention includes the following:

1. **\*\*\* Real estate licensees** should be provided with: 1) C.A.R.’s “Mandatory Government Showing Requirements, including Best Practices Guidelines and Prevention Plan;” and 2) California’s “COVID-19 Industry Guidance: Real Estate Transactions” at: <https://covid19.ca.gov/pdf/guidance-real-estate.pdf> which contain information on showing properties, physical distancing, and other important topics.

2. Provide information on COVID-19, how to prevent the disease from spreading, and which underlying health conditions may make certain individuals more susceptible to contracting the virus.

3. Provide information on how to conduct self-screening at home, including temperature and/or symptom checks using CDC guidelines.

4. Advise on the importance of not coming to work if the employee or real estate licensee has symptoms of COVID-19 as described by the CDC such as a cough, fever, shortness of breath or difficulty breathing, chills, fatigue, muscle or body aches, headache, sore throat, new loss of taste or smell, congestion or runny nose, nausea, vomiting, or diarrhea, OR if they were diagnosed with COVID-19 and have not yet been released from isolation OR if, within the past 14 days, they have had contact with someone who has been diagnosed with COVID-19 and is considered potentially infectious (i.e., still in isolation)

5. Advise on protocols for returning to work after a worker receives a COVID-19 diagnosis. Return to work only if 10 days have passed since symptoms first appeared, their symptoms have improved, and the worker has had no fevers (without the use of fever reducing medications) for the last 72 hours. A worker without symptoms who was diagnosed with COVID-19 can return to work only if 10 days have passed since the date of the first positive COVID-19 test.

6. Advise to seek medical attention if symptoms become severe, including persistent pain or pressure in the chest, confusion, or bluish lips or face. (Updates and further details are available on CDC’s webpage).

7. Remind about the importance of frequent handwashing with soap and water, including scrubbing with soap for 20 seconds (or using hand sanitizer with at least 60% ethanol or 70% isopropanol when employees or real estate licensees cannot get to a sink or handwashing station, per CDC guidelines).

8. Discuss the importance of physical distancing, both at work and off work time to reduce the risk of COVID-19 infections.

9. Provide information about the proper use of face coverings, including:

o Face coverings do not protect the wearer and are not personal protective equipment (PPE).

o Face coverings can help protect people near the wearer, but do not replace the need for physical distancing and frequent handwashing.

o Face coverings must cover the nose and mouth.

o To help prevent infection, employees and real estate licensees should wash or sanitize hands before and after using or adjusting face coverings.

o To help prevent infection, employees and real estate licensees should avoid touching their eyes, nose, and mouth.

o To help prevent infection, face coverings must not be shared and should be washed or discarded after each shift (or other regular, frequent interval).

10. Information contained in the CDPH’s “**Guidance for the Use of Face Coverings**”, which mandates the circumstances in which face coverings must be worn and the exemptions, as well as any policies, work rules, and practices the company has adopted to ensure the use of face coverings. Training should also include the company’s policies on how people who are exempted from wearing a face covering will be handled.

11. Ensure any independent contractors, temporary or contract, and all other workers at the facility are also properly trained in COVID-19 prevention policies and have necessary supplies and PPE. Discuss these responsibilities ahead of time with organizations supplying temporary, contract, and all other workers.

12. Discuss information on employer or government-sponsored leave benefits workers may be entitled to receive that would make it financially easier to stay at home, including employee’s sick leave rights under the Families First Coronavirus Response Act, American Rescue Plan Act of 2021, California SB 95 and any local laws, and rights to workers’ compensation benefits and presumption of the work-relatedness of COVID-19. See additional information on government programs supporting sick leave and workers’ compensation for COVID-19 here: <https://www.labor.ca.gov/coronavirus2019/#chart>

13. Advise workers on how they may access a copy of the Company’s COVID-19 office workplace prevention plan.

**Exhibit C: Cleaning and Disinfecting Protocols**

The company has reviewed the following Cleaning and Disinfecting Protocols and made arrangements to comply as applicable to the company and its workspace(s):

1. Perform thorough cleaning on high traffic areas of offices and other shared workspaces (lobbies, meeting rooms, break rooms, etc.) and areas of ingress and egress (handrails, stairways, elevator controls, etc.). Frequently disinfect commonly used surfaces in shared work areas like counters, light switches, door handles, etc.
2. Avoid sharing phones, other work supplies, or office equipment wherever possible. Never share PPE.
3. Where such items must be shared, disinfect with a cleaner appropriate for the surface between shifts or uses, whichever is more frequent, including the following: shared office equipment, such as copiers, fax machines, printers, telephones, keyboards, staplers, staple removers, letter openers, surfaces in reception areas, shared work stations, etc.
4. Instruct workers to wipe down and disinfect equipment that passes between workers and customers, including clipboards and keys after each use.
5. Equip workplace terminals and desks with proper disinfecting products, including hand sanitizer and sanitizing wipes and provide personal hand sanitizers to all workers.
6. Provide time for workers to implement cleaning practices at their workplaces during their shift. Cleaning assignments should be assigned during working hours as part of the worker’s job duties.
7. Ensure that sanitary facilities stay operational and stocked at all times and provide additional soap, paper towels, and hand sanitizer when needed.
8. Install and encourage the use of hands-free devices, if possible, including motion sensor lights and automatic soap and paper towel dispensers.
9. When choosing disinfecting chemicals, employers should use products approved for use against COVID-19 on the Environmental Protection Agency (EPA)-approved list and follow product instructions. Use disinfectants labeled to be effective against emerging viral pathogens, diluted household bleach solutions (5 tablespoons per gallon of water), or alcohol solutions with at least 70% alcohol that are appropriate for the surface. Provide workers training on the chemical hazards, manufacturer’s directions and Cal/OSHA requirements for safe use. Workers using cleaners or disinfectants should wear gloves and other protective equipment as required by the product instructions. Follow the asthma-safer cleaning methods recommended by the California Department of Public Health and ensure proper ventilation. <https://www.cdph.ca.gov/Programs/CCDPHP/DEODC/OHB/Pages/OHWMay2020.aspx>
10. Require workers to clean and disinfect personal work areas often and supply the necessary cleaning products.
11. Modify hours if necessary, to ensure regular, thorough cleaning of office spaces. Where possible, do not clean floors by sweeping or other methods that can disperse pathogens into the air. Use a vacuum with a HEPA filter wherever possible.
12. Consider installing portable high-efficiency air cleaners, upgrading the building’s air filters to the highest efficiency possible, and making other modifications to increase the quantity of outside air and ventilation in offices and other spaces.

**Exhibit D: Physical Distancing Guidelines**

The company has reviewed the following Physical Distancing Guidelines and made arrangements to comply as applicable to the company and its workspace(s):

* Implement measures to ensure physical distancing of at least six feet

between employees, real estate licensees, and customers. This can include use of physical partitions or visual cues (e.g., floor markings or signs to indicate where workers should stand).

* Utilize work practices, when feasible and necessary, to limit the number of persons at the office at one time. This may include scheduling (e.g., staggering start/end times), establishing alternating days for on-site reporting, returning to the office workspace in phases, or continued use of telework when feasible.
* Redesign office spaces, cubicles, etc. and decrease the capacity for conference and meeting rooms to ensure workspaces allow for six feet between employees, real estate licensees, and others.
* Designate separate routes for entry and exit into office spaces to help maintain social distancing and lessen the instances of people closely passing each other, if possible. Establish directional hallways and passageways for foot traffic, if possible, to eliminate persons from passing by one another.
* Close or restrict, using barriers, or ensure physical distancing by separating tables/chairs in common areas where people are likely to congregate and interact, such as kitchenettes and break rooms. Discourage employees, real estate licensees and others from congregating in high traffic areas such as bathrooms and hallways. Limit the number of individuals riding in an elevator and ensure the use of face coverings.
* Close self-service coffee, water, and snack areas. Provide individual water bottles if there is no other suitable potable water source.
* Consider offering workers who request modified duties options that minimize their contact with customers and others (e.g., managing inventory rather than working as a cashier or managing administrative needs through telework).
* Stagger worker breaks, within compliance with wage and hour regulations, to maintain physical distancing protocols.
* Display signage at entrances and waiting areas to remind people of physical distancing, proper hand hygiene, and face covering usage at every opportunity. Dedicate staff to direct guests to meeting rooms upon entry to office space rather than congregating in lobbies or common areas.
* Discontinue nonessential travel and encourage distance meetings via phone and internet.
* Discontinue shared vehicle trips between workers, contractors, clients, etc. Each party should travel in their own vehicle to offices, properties, or other locations that require in-person activities.
* Require workers to avoid handshakes and similar greetings that break physical distance.
* Avoid passing transaction materials such as pens, paperwork, and keys back and forth between workers and customers.
* Complete real estate transactions with all related parties digitally if feasible. Maintain physical distance when in-person meetings are required with escrow agents, loan officers, mortgage brokers, etc. Meet in spaces that allow for at least six feet of physical distance, such as outside.
* Eliminate person-to-person contact for delivery of goods to physical offices. Avoid touching others’ pens and clipboards.

**Exhibit E: Company Policy for Handling COVID-19 Face Coverings Exemptions**

Our company is committed to complying fully with the Americans with Disabilities Act (ADA) and other applicable federal, state, and local laws. The Company recognizes there may be workers or job applicants who have a medical condition, mental health condition, or disability that prevents them from wearing a face covering (e.g., persons with a medical condition for whom wearing a face covering could obstruct breathing, or persons who are hearing impaired, or communicating with a person who is hearing impaired, where the ability to see the mouth is essential for communication).

Per the CDPH’s “**Guidance for the Use of Face Coverings**,” persons exempt from wearing a face covering due to a medical condition, who are employed in a job involving regular contact with others, should wear a non-restrictive alternative, such as a face shield with a drape on the bottom edge, as long as their condition permits it.

For individuals who cannot wear a face covering or face shield, the Company will engage in the interactive process with the individual to discuss any available reasonable accommodations. For example, if the individual provides a legitimate medical reason for not being able to wear a face covering or face shield, reasonable accommodation might include allowing the individual to work remotely or providing other alternative work arrangements.

As part of the interactive process, the Company may request additional information and medical documentation from the individual regarding the medical condition and restriction of being unable to wear a face covering or face shield.

All questions regarding this policy should be directed to: [insert contact information for Human Resources or appropriate Company staff]

**Exhibit F: Face Coverings Policy for Clients and Customers (SAMPLE-- you may wish to add more detailed policies for your company)**

Per the CDPH’s “**Guidance for the Use of Face Coverings**,” clients, customers, visitors, and other members of the public who visit the company’s office workplace or who personally interact with Company workers while working off-site must wear face coverings to protect workers, other clients and customers, and other members of the public.

The Company recognizes there may be clients, customers and other individuals who have a medical condition, mental health condition, or disability that prevents them from wearing a face covering (e.g., persons with a medical condition for whom wearing a face covering could obstruct breathing, or persons who are hearing impaired, or communicating with a person who is hearing impaired, where the ability to see the mouth is essential for communication).

Per the CDPH’s “**Guidance for the Use of Face Coverings**,” persons exempted from wearing a face covering due to a medical condition should wear a non-restrictive alternative, such as a face shield with a drape on the bottom edge, as long as their condition permits it.

Our company is committed to complying fully with the Americans with Disabilities Act (ADA) and other applicable federal, state, and local laws. Our company will provide individuals with disabilities equal access to our company’s goods and services, including making reasonable modifications to our policies, practices, and procedures on required face coverings in order to ensure equal access for individuals with disabilities. If an individual has a disability preventing the individual from wearing a face covering or face shield, or the individual is otherwise exempt from the face covering requirement, the company’s reasonable accommodation for the individual might include providing services online, via phone or videoconference, providing curbside/contact-free pickup of materials, providing specified entry hours for the individual, or other accommodations.

Our company will not require the client, customer, visitor or other member of the public to provide a doctor’s note if the individual states they have a medical condition preventing them from wearing a face covering or face shield.

If an individual’s refusal to wear a face covering is based on mere social objection, we may refuse entry to the office workplace or in-person interaction with Company workers.