



Loudoun County Government Administrative Policies and Procedures

Title: Face Coverings in the Workplace	Effective Date: May 29, 2020
Number: HR-47	Date Last Reviewed/Revised: N/A
	Date of Next Review: July 1, 2020

I. Purpose

To provide guidance to County employees, contractors, and volunteers regarding the use of face coverings when working in County facilities, on County property, in County vehicles with more than one occupant, or while otherwise performing work on behalf of the County under circumstances where social distancing cannot be maintained. The consistent use of face coverings, in accordance with this policy, will also demonstrate to the public the County's commitment to adhering to public health best practices and recommendations related to COVID-19. County employees, contractors, and volunteers will be required to follow these practices until further notice pursuant to the phased reopening timeframes referenced below.

II. Authority

In accordance with [§ 15.2-1200](#) of the Virginia Code, any county may adopt such measures as it deems expedient to secure and promote the health, safety and general welfare of its inhabitants which are not inconsistent with the general laws of the Commonwealth, to include the adoption of necessary regulations to prevent the spread of contagious diseases among persons.

In accordance with [Chapter 3.3](#) of the Human Resources Handbook, Employee Appearance & Dress, the County Administrator has the authority to approve and amend appearance and dress guidelines for the County's workforce.

III. Scope

All County employees, contractors, and volunteers who work in County facilities or on County property, travel in County vehicles, or who otherwise come into contact with other employees, contractors, volunteers, or members of the public while performing work on behalf of the County, are subject to the requirements of this policy.

IV. Definitions

- A. Approved Face Covering:** A County-issued cloth face covering or a personal face covering that meets the criteria outlined in Section VI (A) (1) (c) of this policy.

- B. **Cloth Face Covering:** A cloth covering for the face, designed to be secured to the head with ties or ear loops, for the purpose of covering the nose and mouth. The Centers for Disease Control (“CDC”) recommends the use of cloth face coverings to help prevent people who may have COVID-19 and do not know it from transmitting it to others. Cloth face coverings are not personal protective equipment (defined below) and do not provide protection for the wearer.
- C. **Personal Protective Equipment (“PPE”):** County issued equipment worn to minimize exposure to hazards that cause serious workplace injuries and illnesses. Personal protective equipment may include items such as gloves, safety glasses and shoes, earplugs or muffs, hard hats, respirators, or coveralls, vests and full body suits.
- D. **Social Distancing:** The practice of keeping a distance of six feet or more from other people in public places during the outbreak of a contagious disease in order to minimize exposure and reduce the transmission of infection.

V. Policy Statement

In accordance with guidance from the CDC, some people with COVID-19 have no signs or symptoms (are asymptomatic) and do not feel sick, but can still pass the virus on to others. A cloth face covering can help prevent asymptomatic individuals from transmitting COVID-19 to others. As such, in an effort to reduce the potential spread of COVID-19 from asymptomatic employees, face coverings shall be worn by all employees, contractors, and volunteers when they cannot maintain a six-foot distance from other people while performing work on behalf of the County.

In an effort to ensure compliance with this policy, the County shall issue cloth face coverings to all County employees, contractors and volunteers. Personal (employee purchased or made) face coverings are permissible as long as the face covering meets the guidelines outlined in Section VI (A) (1) (c) of this policy. Management reserves the right and full discretion to determine whether any specific personal face covering meets the requirements outlined in this policy.

A. Intended Use

Cloth face coverings are used to keep a person from potentially transferring respiratory droplets to other individuals. Proper social distancing, handwashing, refraining from touching one’s face, and wearing face coverings, taken together, have been shown to be effective in slowing the spread of COVID-19.

B. Non-Intended Use

Cloth face coverings are **not** PPE and **shall not** be used in place of County issued PPE under any circumstances. PPE is intended to be worn by employees who must provide services to individuals who are suspected or confirmed to have COVID-19, may have close contact with such individuals, or may be exposed to contaminated spaces as part of their job duties. Employees who are assigned these types of jobs duties are issued appropriate PPE by the County as necessary. Cloth face coverings shall only be worn by such employees when they **are not** engaging in work activities where they are required to wear PPE.

Cloth face coverings are **not** intended to replace the consistent practice of social distancing or personal hygiene habits such as frequent hand washing and avoiding touching one's face. Employees shall to continue to practice social distancing and personal hygiene when wearing a cloth face covering, wherever possible.

Cloth face coverings are **not** intended to allow employees who are showing symptoms of an infectious illness, such as the cold, flu, or COVID-19, to report to work. Employees who are showing signs of illness **shall not** report to their work location with or without a cloth face covering. Employees who are sick or who suspect they may be sick must stay home. If an employee becomes sick at work, he/she should alert his/her supervisor and be sent home immediately.

C. Accommodations

If an employee is unable to properly wear a face covering because of a disability or serious health condition, the employee may request a reasonable accommodation in accordance with Human Resources Administrative Policy, [HR-02 Americans with Disabilities Act \(ADA\) Employment Procedures](#). Human Resources and management will engage the employee in an interactive process to determine if a reasonable accommodation can be made to assist the employee with performing the essential functions of his or her job.

If an employee is unable to wear a County issued cloth face covering due to sincerely held religious beliefs, the employee may request a reasonable accommodation by contacting his or her supervisor, a department manager or the Department of Human Resources (Employee Relations Division). Human Resources and management will engage the employee in a process to determine if an accommodation can be granted.

It is anticipated that this policy will be in effect for Phases 1, 2 and 3 of reopening, in accordance with any Executive Orders issued by the Governor of Virginia. This policy will be amended as necessary to account for CDC and other guidance issued as reopening progresses in the Commonwealth.

VI. Procedures

A. Employee Responsibilities

Employees are responsible for following the requirements outlined in this policy. Violations of this policy may result in disciplinary action, up to and including termination of employment.

1. Employees shall only wear approved face coverings, to include County issued cloth face coverings or personal face coverings that meet the requirements and restrictions outlined below:

- a. Employees are strongly encouraged to wear County issued cloth face coverings, which the County will make available in a variety of styles. Employees may choose to wear their own personal face covering provided it meets the requirements outlined in Section VI (A)(1)(c) below. Management reserves the right and full

discretion to determine whether any specific personal face covering meets the requirements outlined in this policy.

- b. Employees who wish to wear a personal face covering should be aware of the CDC's guidance related to face coverings. The CDC lists five criteria for "cloth face coverings," which should:
 - fit snugly but comfortably against the side of the face
 - be secured with ties or ear loops
 - include multiple layers of fabric
 - allow for breathing without restriction
 - be able to be laundered and machine-dried without damage or change to shape.
- c. If an employee chooses to wear a personal face covering, it shall, at a minimum, meet the following criteria:
 - be clean and in good condition
 - fully cover the nose and mouth
 - remain in place without being held by hands
- d. Current CDC guidance advises that medical masks and respirators be reserved for healthcare workers and other first responders. Employees who are **not** required to wear PPE (such as N95 respirators masks, medical masks, or face shields) to perform their job duties are strongly discouraged from wearing these items in the workplace or while performing official County duties.
 - **Please note:** if employees wish to wear self-provided respirators, the County strongly recommends they consult with their personal physicians to make sure they are physically able to use such respirators safely.
 - **Please note:** Disposable face masks, such as surgical and procedural masks, are intended for brief, single use purposes and should be immediately disposed of once the wearer removes the mask. Employees are required to properly dispose of such masks immediately after use, to include throwing the mask in a trash receptacle and then thoroughly washing their hands with soap and water or using a hand sanitizer with at least 60% alcohol. Used disposable masks shall not be placed or disposed of anywhere on County property other than in a trash receptacle.
- e. All personal face coverings must comply with County and department level dress and appearance policies and must be free from potentially inappropriate, offensive, or political language, images, and graphics. When using a personal face covering, it is recommended that employees choose solid colored material with no visible markings.
- f. An employee wearing a face covering not in compliance with County standards shall be directed to wear a County-issued cloth face covering. Employees who

refuse to comply with this policy shall be sent home and shall be subject to disciplinary action, up to and including termination.

2. Employees shall properly wear the face covering.

- a. Employees are required to wear face coverings in the proper manner, to include ensuring the cloth face covering fits snugly but comfortably against the side of the face, covers the nose and mouth, and is properly secured to the employee's head with the original ties or loop, where applicable.
- b. Employees shall closely follow CDC guidance regarding putting on and removing face coverings appropriately and safely. This guidance is attached and can also be found [here](#). Improper use or care of cloth face coverings can increase a person's risk of illness.

3. Employees shall wear the face covering at all required times and places.

- a. Employees are required to wear cloth face coverings when in common areas of County buildings (including, but not limited to, stairwells, elevators, hallways, canteens, break rooms, bathrooms, lobbies, and conference rooms) or when they are in any space where social distancing is not possible.
- b. Face coverings are required even if there are barriers such as cubicle walls and sneeze guards, unless there is also a distance of 6 feet or more between individuals.
- c. Face coverings are **not** required for employees while working away from others in an office, cubicle (if separated by more than six feet), or other area physically separated at a minimum of six feet from other employees. However, employees are asked to carry their face covering with them at all times so that if they encounter a situation when the cover is needed, they can put it on.
- d. Employees are allowed to use County-issued cloth face coverings outside of the workplace; however, when doing so, must remember that they are representing Loudoun County if they are wearing a County branded face covering.

4. Employees shall properly maintain their cloth face covering.

- a. Employees are responsible for the proper use, care and cleaning of their face coverings. Each employee will be issued three face coverings. Reusable face coverings should be washed after each day of use with water and a mild detergent and dried completely in a hot dryer. Face coverings that are not washable should only be worn for one day and then discarded.
- b. Employees shall regularly inspect the condition of their face coverings and request replacements through their department if face coverings become damaged (i.e. holes in the material, straps broken, etc.)
- c. Employees must not share their County-issued cloth face coverings with any other individual, including family members.

5. Employees shall continue to consistently practice social distancing and proper personal hygiene.

Employees shall continue to practice social distancing and healthy hygiene practices at all times regardless of the use of face coverings. This includes frequent handwashing for a minimum of 20 seconds with soap and water, or using hand sanitizer with at least 60% alcohol.

6. Employees shall raise concerns related to cloth face coverings and/or this policy to their supervisor, a member of management, or the Department of Human Resources; such concerns may include, but are not limited to:

- a. Requests for an ADA reasonable accommodation or religious accommodation related to the requirement to wear a face covering.
- b. Safety concerns related to the use of face coverings while performing specific job duties or in specific situations.
- c. Concerns related to another employee's use, non-use, or maintenance of face coverings. Employees shall not confront other employees with regard to these issues.

B. Management Responsibilities

1. Department management is responsible for timely distributing County issued cloth face coverings to all employees and for replacing any lost or damaged County issued cloth face coverings in a timely fashion.
2. Department management shall enforce all requirements of this policy in as consistent a manner as possible throughout the department, to include enforcement with employees, contractors, and volunteers. Management shall ask contractors and volunteers who refuse to wear a face covering to leave the facility until they comply. Management should immediately notify the Department of Finance and Budget (Procurement Division) if a contractor is asked to leave due to noncompliance.
3. Supervisors shall ensure that members of their teams comply with the requirements of this policy. Supervisors shall remind employees who are out of compliance with this policy of the policy requirements. Supervisors shall direct employees who refuse to comply with this policy to leave the workplace. Supervisors should advise the Department of Human Resources immediately if an employee is sent home due to failure to comply with this policy. Supervisors shall consult with the Department of Human Resources on discipline related to violations of this policy.

Responsible Departments

County Administration and Human Resources