



# Coronavirus Disease 2019 (COVID-19) Guidance for Businesses with Seasonal Workers Housed in Communal Living Arrangements

June 19, 2020

All businesses, including businesses with seasonal workers housed in communal living arrangements, are required to prepare and implement a plan for resuming services in a phased approach in accordance with established Rhode Island COVID-19 executive orders (EOs), emergency regulations, and guidance. People living and working in shared or congregate seasonal housing may have challenges with physical distancing to prevent the spread of COVID-19. Shared housing residents often gather together closely for social, leisure, and recreational activities; shared dining; and/or use of shared equipment, such as kitchen appliances, laundry facilities, stairwells, and elevators.

All businesses must have established procedures for facility cleaning, health screening, physical distancing, and face covering in line with the Rhode Island Department of Health's (RIDOH) emergency regulations, [Safe Activities by Covered Entities During the COVID-19 Emergency \(216-RICR-50-15-7\)](#). Note that one of the requirements in these emergency regulations is the creation of a COVID-19 Control Plan. A Control Plan template ([in English](#) and [in Spanish](#)) are posted on the Reopening RI website.

The [Reopening RI site](#) includes guidance and other materials that businesses with seasonal workers housed in communal living arrangements may find to be helpful and useful, including:

- Rhode Island Phase II: General Business/Organization Guidelines ([English](#) and [Spanish](#))
- Rhode Island's Business/Organization Checklist ([English](#) and [Spanish](#))
- Poster for employers ([English](#) and [Spanish](#))
- Poster for employees ([English](#) and [Spanish](#))

In addition to the requirements referenced above for all businesses, businesses that house seasonal workers in communal living arrangements must follow the following, additional minimum requirements and are strongly encouraged to implement enhanced standards to further reduce risk.

## I. Summary of Communal Living Guidelines for Operations during COVID19

These guidelines provide requirements and guidance to reduce the risk of introducing and transmitting COVID-19 disease among seasonal workers housed in communal living arrangements. They should be used in conjunction with existing seasonal worker housing operation and management plans, procedures, guidance, resources, and systems. These guidelines are based on what is currently known about the transmission and severity of COVID-19.

There are several actions businesses with seasonal workers housed in communal living arrangements can take to help lower the risk of exposure to, and spread of, COVID-19. The risk for spreading COVID-19 increases when employees interact with more people, interact more closely with other people, share more items with other employees, and interact with other employees for longer periods of time. Therefore, the risk of COVID-19 spread depends on the type of activity. Businesses can ensure maximum health and safety for their employees by reducing risk to the lowest, reasonable, practical level through the implementation of preventive measures. The risk level of COVID-19 spread increases for temporary workers housed in communal living arrangements based on various scenarios. Each business should conduct its own risk assessment to determine the level of risk it is willing to assume to protect employees from COVID-19. Generally, businesses should require physical distancing of 6 ft during the entire time employees are housed, including while recreating, cooking, and sleeping.

## Communal Living Arrangements

Businesses that house seasonal workers in communal living arrangements, as defined in RIDOH's regulations, *Communal Living Arrangements (216-RICR-50-15-9)*, are required to:

## **Bathrooms**

### Minimum Requirements

- Bathrooms are required to be cleaned by the employer at least once a day with an EPA-registered disinfectant.
- Bathrooms must have, at all times:
  - Soap; and
  - Paper towels or automatic hand dryers.
- Posters describing and/or depicting proper hand hygiene must be hung in bathrooms.
- Residents must be notified in writing: "Sinks and nearby countertops are potential infection sources. You should not put your toothbrushes or other personal items directly on these surfaces."

### Recommended Enhancements and Guidance

Lower risk for transmission of illnesses in communal living arrangements can be achieved by:

- Limiting the number of people per bathroom to **two** people. Note: this means each living space has a number of bathrooms equal to half the number of people living in the space and that each person uses their assigned bathroom.
- Add physical barriers, such as flexible plastic screens, between bathroom sinks where there are multiple sinks.
- Forbid the use of hair dryers or ensure that if a hair dryer is used, it should be used in a room separate from other people and that has fresh air provided through an open door or window.

If the above is not possible, it is recommended to:

- Limiting the number of people per bathroom to **four** people. Note: this means each living space has a number of bathrooms equal to half the number of people living in the space and that each person uses their assigned bathroom, in addition to other low-risk guidance.

The following other recommendations can help mitigate the potential for COVID-19 transmission:

- *Wash Your Hands* posters are [available in multiple languages on the Centers for Disease Control's \(CDC\) website](#) and can be posted in communal areas and bathrooms.
- Hand sanitizer should be available.
- Totes can be used to carry personal items to limit their contact with other surfaces in the bathroom.

## **Common spaces**

### Minimum Requirements

- Communal living arrangements are required to limit the number of persons allowed in common spaces at one time, such as the kitchen and dining room, so that social distancing between individuals can be achieved. Alternatively, common areas may be closed; provided, however, that kitchens, bathrooms, and laundry rooms must remain available to residents.

- Residents are prohibited from sharing dishes, drinking glasses, cups, or eating utensils. Any non-disposable food service items must be washed with dish soap and hot water or in a dishwasher.
- Proper sanitization of shared cooking utensils (such as knives, ladles, spatulas) and shared appliances (such as stoves, microwaves, and refrigerators, etc.) is required. The communal living arrangement must supply the sanitization product.
- Individuals are required to wash their hands after handling used food service items.
- If in use, common areas must be cleaned at least once a day with an EPA-registered disinfectant.
- The business is required to provide adequate storage for each individual's necessary reusable personal protective equipment (PPE), such as work gloves, coveralls, safety glasses, boots, etc.

### Recommended Enhancements and Guidance

Lower risk for transmission of illnesses in communal living can be achieved by:

- Restricting the number of people in the kitchen at any one time to two people.
- Closing all common spaces except the kitchen and laundry rooms (e.g., living room, activity room).
- Limiting the number of individuals in an elevator at one time to allow distancing and designate one-directional stairwell.
- Ensuring shared rooms in the establishment have good air flow provided by an air conditioner or an opened window.

## Laundry

### Minimum Requirements

- The business must provide residents access to adequate laundry supplies.
- Laundry rooms must be cleaned by the business at least once a day with an EPA-registered disinfectant.

### Recommended Enhancements and Guidance

- Post [guidelines](#) for doing laundry safely (washing instructions, handling of dirty [laundry](#), [restricting the number of people allowed in the laundry room at one time to ensure proper physical distancing](#)), if possible.

## Trash removal

### Requirements

- Trash receptacles in all rooms must be emptied by the business at least once per day.

## Bedrooms

### Requirements

- The business shall ensure that bedrooms and sleeping quarters are configured to maximize physical distancing between individuals.

[Recommended way to achieve this requirement are:

- Arranging beds in head-to-toe configurations with at least six feet between beds whenever feasible.
- Adding physical barriers, such as flexible plastic screens when beds cannot be six feet apart.
- Minimizing or avoiding the use of bunk beds, which make distancing more difficult.]

### Recommended Enhancements and Guidance

Lower risk for transmission of illnesses in communal living can be achieved by:

- Limiting the number of people per bedroom to **two** people. Note: this means each living space has a number of bathrooms equal to half the number of people living in the space and that each person uses their assigned bathroom.

If the above is not possible, it is recommended to:

- Limiting the number of people per bedroom to **four** people. Note: this means each living space has a number of bathrooms equal to half the number of people living in the space and that each person uses their assigned bathroom.

## Health checks, Isolation, and Quarantine

### Requirements

- The business must conduct a daily health check for every resident. The health check includes, but is not limited to, the screening questions outlined in § 7.4.1(A)(2) of this Subchapter.
- Health checks must be carried out in a manner that prevents persons from congregating in large crowds.
- The business must accommodate residents who:
  - Must self-isolate, as required by Executive Order 20-20, after having been clinically diagnosed with COVID-19 by a licensed health care practitioner by assessment of symptoms or by laboratory testing; and
  - Must self-quarantine, as required by Executive Order 20-20, after having been in known close contact (within six (6) feet) with a person who has been clinically diagnosed with COVID-19 by a licensed health care practitioner by assessment of symptoms or by laboratory testing and who has been contacted by the Department of Health to inform them that they were a close contact with a confirmed positive case must immediately self-quarantine for fourteen (14) days following that contact.
- The business must have an Isolation and Quarantine Plan to accommodate residents who present with or develop symptoms of COVID-19 or have COVID-19. The Isolation and Quarantine Plan must address the following:
  - Self-isolation and self-quarantine as required above; and
  - Limiting the number of persons who interact with residents in self-isolation or self-quarantine to providing food, medications, supplies and/or other necessary assistance.
- The business shall be required to take physical and/or logistical steps to assist a resident to access the healthcare system, including transportation to and from healthcare facilities, for COVID-19 related testing and care.

- To the extent a business receives information relative to COVID-19 screening, symptoms, and test results of its residents, such business must treat such information in accordance with all applicable state and federal law.

### Recommended Enhancements and Guidance

In developing and Isolation and Quarantine Plan, you should consider including measures that:

- Designate one person who is not at higher risk of severe illness to deliver items to an ill, isolated person such as food, medications, and/or basic daily supplies.
- Utilize separate buildings or rooms instead of physical barriers where possible.
- Provide separate food and bathroom access where possible.
- Restrict access to non-essential persons.
- If separate accommodations are not possible, roommates of a person confirmed with COVID-19 will need to quarantine for the entire time that the sick person is symptomatic plus an additional 14 days from the last day of the sick person's symptoms. In practical terms, this means that a roommate needs to be in quarantine for longer than 14 days.

## Screening Procedures

### Requirements

Businesses with seasonal workers housed in communal living arrangements are required to implement, and ensure compliance with, screening of all individuals entering its establishment(s) at any time for any reason. Such screening shall include, at a minimum:

1. Visual assessment, self-screening, a written questionnaire, or a combination of any of these screening methods regarding COVID-19 symptoms and potential exposure in the last 14 days to other individuals who are COVID-19 positive or who have COVID-19 symptoms; and
2. Posted notice at all entrances to an establishment that all individuals entering must be screened or self-screened, and not to enter if they are COVID-19 positive, have COVID-19 symptoms, or have had close contact in the last 14 days with an individual who, at the time of contact, had COVID-19.

If an employee or visitor is identified as having COVID-19 symptoms, the business must deny access to that individual unless the establishment is a healthcare facility with other access requirements/limitations or the individual is a resident in a multi-unit residential establishment.

Businesses are encouraged to use the screening tool located on the Reopening RI site to screen employees, clients, and/or visitors for symptoms of COVID-19. This tool is available in [English](#) and in [Spanish](#).

## Face masks and other personal protective equipment

In accordance with RIDOH's emergency regulations, [Safe Activities by Covered Entities During the COVID-19 Emergency \(216-RICR-50-15-7\)](#), all individuals in public or in an establishment are required to wear a cloth face covering that covers their mouth and nose unless physical distancing can be maintained easily and continuously. Employers must supply cloth face coverings or materials to make face coverings for each employee at no expense to the employee.

Nothing shall prevent an employee from making his or her own cloth face covering or voluntarily providing and wearing other equivalent or more protective face coverings (such as N-95 respirators and surgical masks). Cloth face coverings are not required for individuals who are required by their employers or by state or federal law to wear other more protective respiratory protection (such as N-95 respirators and surgical masks). Cloth face coverings are not required for:

- Anyone who would damage their physical or mental health by wearing a face covering;
- Anyone who is developmentally unable to use a cloth face covering, including young children who may not be able to effectively wear a cloth face covering; or
- Anyone who is performing an activity of daily living (e.g. eating);
- Anyone whose safety would be negatively impacted by wearing a face covering or would put themselves at an increased risk of harm to others (e.g. near open flames); or
- Anyone who is outside and can easily and continuously maintain at least six feet of distance from other people.

If any employee or volunteer refuses to wear a cloth face covering when required by these regulations and that individual is not otherwise exempt from the requirements, an agency or organization is required to deny access to the establishment. Agencies and organizations are not required to refuse entry to a visitor not wearing a face covering.

## Clear Communications Plan

### Requirements

In accordance with RIDOH's emergency regulations, [Safe Activities by Covered Entities During the COVID-19 Emergency \(216-RICR-50-15-7\)](#), Communal living facilities must ensure the placement of posters or signs at entry to its establishments educating any individual at the establishment about entry screening, required physical distancing, use of cloth face coverings, and other subjects as provided in guidance issued by the RIDOH. [Copies of acceptable posters](#) are available on RIDOH's website.

Communal living facilities are required to instruct any person entering the communal living establishment to wear cloth face coverings except when physical distancing from others in the establishment is easily, continuously, and measurably maintained or the individual is exempt from wearing a cloth face mask. Individuals must wear a cloth face covering when at an entrance, exit, and common areas of any establishment including, but not limited to check-in, registration, reception, waiting areas, hallways, corridors, bathrooms, elevators, and stairways.

### Recommended Enhancements and Guidance

Communal living facilities should use health messages and materials developed by credible public health sources, such as RIDOH and/or CDC. Businesses should consider:

- Posting signs at entrances and in other strategic places that provide instruction on hand hygiene, respiratory hygiene, cough etiquette, and cloth face coverings;
- Providing educational materials about COVID-19 for non-English speakers, as needed; and
- Encouraging ill staff and volunteers to stay home (or be sent home if they develop symptoms while at the facility), to prevent spreading the infection to others.

Communal living facilities should identify and address potential language, cultural, and disability barriers associated with communicating COVID-19 information to seasonal workers and visitors. Owners/operators should provide [basic guidance](#) about COVID-19 and steps being taken to prevent transmission in housing areas in language(s) and/or illustrations workers understand.

## Other Processes and Activities

### Recommended Enhancements and Guidance

Communal living facilities should consider ensuring utilization of the highest efficiency filters that are compatible with the establishment's existing HVAC system (if there is one) and adopt "clean-to-dirty" directional airflows. If resources allow, ceiling fans with upward airflow rotation combined with upper-air ultraviolet germicidal irradiation (UVGI) disinfection systems can be utilized. When conditions allow (low humidity), shaded outdoor spaces with cross-draft airflow augmented by evaporative coolers may provide a safer alternative. [CDC guidance on air exchange systems](#) is available on their website.

## II. Human Resources

Businesses who have employees living in communal living housing should plan for seasonal worker absences and develop flexible sick-leave policies. Workers may need to stay home when they are sick. Businesses should consider requiring staff to stay home when sick, even without documentation from doctors. Businesses are encouraged to ensure that employees are aware of, and understand, these policies. Businesses should provide employees with a list of healthcare facilities where workers can receive appropriate care, if needed. Businesses should identify critical job functions and positions, and plan for alternate coverage by cross training workers. CDC has [guidance on developing flexible sick-leave policies](#) posted on its website.

## III. Other Considerations

Under the Governor's [Executive Order 20-40](#), any person arriving from a location outside the 50 states or the District of Columbia must immediately self-quarantine for 14 days upon arrival in Rhode Island. [Instructions for self-quarantine](#) are posted on RIDOH's website.