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COUNTY OF SANTA CLARA**

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MEMORANDUM

TO: County Executive Leaders

FROM: Jeffrey V. Smith, County Executive
James R. Williams, County Counsel

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Jeffrey V. Smith
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James R. Williams
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RE: COVID-19 Requirements Relating to Face Coverings for County Personnel and Visitors in County Facilities – LAST UPDATED July 30, 2021

DATE: July 30, 2021

This memorandum updates the County’s face covering requirements for County personnel¹ and visitors to reflect recent guidance from the U.S. Centers for Disease Control and Prevention and the California Department of Public Health.² This update responds to new evidence of the increased prevalence and transmissibility of the B.1.617.2 (“Delta”) variant.

- All personnel, regardless of vaccination status, must wear face coverings in indoor settings and in vehicles being used for work.
- All visitors to County facilities must continue to wear face coverings.

More detail on these requirements and the limited exceptions are described below.

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¹ “County personnel” includes all County employees, as well as those contractors and volunteers who regularly perform work at County facilities.

² This memorandum replaces the memorandum of the same title last updated on July 20, 2021.

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1. **Face Covering Requirements for County Personnel**

Except as specified below, all personnel must wear face coverings in indoor settings and when in vehicles being used for work. This requirement applies to all personnel, regardless of their vaccination status and in all indoor settings. There are no exceptions for areas that are not open to the public.

a. **Limited Exceptions to Face Covering Requirements for County Personnel**

Medical or mental condition or disability or hearing-impaired. County personnel who cannot wear a typical face covering due to a medical or mental health condition or disability or are hearing-impaired may receive a reasonable accommodation allowing them not to do so. Any County employee who believes they may have a condition or disability that prevents them from wearing a face covering should contact their supervisor or manager and ask about the reasonable accommodation process. Employees exempted from wearing face coverings due to a medical condition, mental health condition, or disability must wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits it.

Temporary mask removal. County personnel may briefly remove their face covering for the following purposes but must put it back on as soon as they are finished:

- When eating or drinking at the workplace. However, personnel:
 - May not congregate with other coworkers to eat or drink indoors in any County facility.
 - May not eat, drink, or gather in kitchens/lunchrooms in County workplaces (but can use appliances like refrigerators and microwaves, or meet other needs they can carry out with a face covering on, such as lactation).
 - If outdoors and not fully vaccinated, must maintain at least six feet distance from other employees when removing their face covering to eat or drink.

In unique work environments where personnel have limited or no ability to eat or drink during working hours outside of a breakroom, the department should seek direction from the County's Chief Operating Officer regarding an appropriate, department-specific protocol.

- When communicating with a hearing-impaired person where the ability to see the mouth is essential for communication.

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- For specific tasks which cannot feasibly be performed with a face covering (e.g., using an inhaler or taking medicine).
- For fully vaccinated personnel only, when alone and inside a personal office that is fully enclosed by four walls and a door.
- For fully vaccinated personnel only, when testifying in a judicial or administrative proceeding, or during a deposition.

2. Face Coverings for Visitors to County Facilities

All visitors to any indoor County facilities must wear face coverings while inside those facilities regardless of vaccination status unless they meet one of the following:

- They are under 2 years of age.
- They have a medical condition, mental condition, or disability that prevents wearing a face covering.
- They are hearing impaired or actively communicating with a person who is hearing impaired where the ability to see the mouth is essential for communication.

A visitor is anyone who enters a County facility and is not County personnel. All County departments and facilities must post signs at their entrances to alert persons that visitors cannot enter if they are not wearing a face covering or meet one of the narrow exceptions. The County has created signs for this purpose, available at <https://covid19.sccgov.org/flyers-and-posters>.

3. Acceptable Face Coverings

Face coverings may be reusable cloth masks, disposable surgical masks, medical procedure masks, or respirators such as N95s. A face covering must:

- Fit snugly over the nose, mouth, and chin.
- Hook around the ears or tie behind the head.
- Have no visible holes or openings.
- If cloth, be constructed of tightly woven fabric of at least two layers. Any face covering must have no visible holes or openings and must cover the nose and mouth.

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The following categories of face coverings do not comply with County requirements:

- Neck gaiters, scarves, ski masks, balaclavas, bandanas, turtlenecks, collars, or single-layer cloth face coverings.
- Face coverings with an exhalation valve, because they allow unfiltered air (which may contain droplets and aerosols) to be released.

Face shields (plastic barriers that typically extend from the forehead to the chin) are not equivalent to face coverings and do not fulfill face covering requirements.

4. County-Issued Face Coverings and Respirators

Employees may bring and wear their own face coverings so long as they meet the requirements of this policy and any department-specific requirements (e.g., healthcare and jails/congregate living environments may require that employees use provided surgical masks and other specific personal protective equipment). Employees may also request and receive face coverings from the County to use at on-site work. Each department must set up a process for its employees to request and receive face coverings for this purpose.

If employees are required by the County to use respirators to perform their jobs, the County will provide those respirators. If employees are not fully vaccinated and are working on-site indoors or in vehicles with more than one person, they may also request and receive a respirator (e.g., N95 mask) from the County to use at work. Each department must set up a process for its employees to request and receive respirators for this purpose. Departments may request surgical masks or N95 masks through the existing Countywide process to request personal protective equipment.

CONCLUSION

Your timely attention to ensure compliance with these requirements is essential to the County's efforts to control the spread of COVID-19 and to comply with public health recommendations. If a department has any questions or concerns about these requirements, it may contact Chief Operating Officer Miguel Márquez.