Guidance for HEERA Managers re Employee Compliance with Face Mask Requirement

In accordance with the Los Angeles County Department of Public Health, the University requires that all employees, regardless of vaccination status, wear face masks indoors until otherwise notified, unless the employee qualifies for one of the exceptions listed below. Given the COVID-19 environment is fluid, please refer to the Safer Return website for the most recent health and safety requirements and recommendations https://www.cpp.edu/safer-return/index.shtml.

Exceptions include:

- persons who are alone in a separate room, office, or interior space;
- persons actively eating or drinking, provided they are at least 6 feet apart;
- persons who are showering or engaging in personal hygiene or a personal care service that requires the removal of the face mask;
- persons younger than 2 years old must not wear a mask because of the risk of suffocation;
- persons with a medical condition or disability that prevents wearing a mask, 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 (this is determined upon consultation with the ADA Coordinator and alternative PPE may be required as part of the accommodation process, adacoordinator@cpp.edu);
- persons for whom wearing a mask would create a risk to the person related to their work, as determined by applicable local, state, or federal regulations or workplace safety guidelines (this is determined upon consultation with EH&S, ehs@cpp.edu).

If you are made aware of or observe non-compliance with the face mask requirement from staff within your department, please follow the procedural steps listed below:

1. If you are on-campus and in temporal proximity to the non-compliant staff member, please verify the non-compliant report. If verified, then you can provide a gentle reminder in-person or via phone call or email. DO NOT confront the employee in front of other employees. A gentle reminder can include the following: “I noticed that you may not have been fully complying with the indoor face mask requirement. As a reminder, all University employees are required to wear a face mask indoors while on campus regardless of vaccination status as a health and safety measure. If you need a mask, you can pick one up from [specify campus/department location where extra masks are available].”

   ❖ Depending on the interpersonal working relationship with your employee, your communication can be adjusted to reflect normal communication styles and methods. For contributing factors not expressly covered in this guidance, please consult with Employee/Labor Relations for guidance and direction at elr@cpp.edu.

2. If you are not in the physical location at the time of the report or are not able to verify the non-compliance, you may call or email your employee and use the following: “I was made aware that you may not have been complying with the indoor face mask requirement. As a reminder, all
University employees are required to wear a face mask indoors while on campus regardless of vaccination status as a health and safety measure. If you need a mask, you can pick one up from [specify campus/department location where extra masks are available].”

Please note: A gentle reminder is not necessary for face masks that temporarily slip down the face (assuming the employee pulls the mask back up shortly thereafter), are being adjusted by the employee, or are being momentarily removed or placed back on related to eating/drinking purposes or as otherwise listed under the exceptions above. Employees may periodically forget or may be unaware of the face covering requirement. They may also need time to adjust to the department increasing employee population. Please take the time to ensure all factors have been considered before approaching or referring the employee for next steps and communications are with a sense of community and shared responsibility.

3. If your employee demonstrates a pattern of not wearing their face mask in good faith or has expressly communicated a refusal to wear a face mask, please contact Employee/Labor Relations at elr@cpp.edu immediately. Employee/Labor Relations will work directly with the employee regarding the matter. Progressive discipline will be pursued for willful non-compliance from employees up to and including dismissal.

Proactive and supportive efforts to implement:

1. Leverage the Safer Return Weekly News communications to provide general updates to your staff during department meetings. For specific questions from staff, please refer employees to the designated campus partner and refrain from speculating about or interpreting non-explicit health and safety requirements and policies. If you are unsure where the employee inquiry should be directed, please contact Employee/Labor Relations at elr@cpp.edu.

2. Maintain an inventory of disposable face masks within your department in the event an employee forgets a mask or needs a replacement mask. Having a local supply of extra masks and informing your employees in advance where they can obtain a mask if they forget to bring one or need a replacement, will hopefully prevent un-masked employees from engaging with co-workers or walking from building to building in search of a face mask. To order face masks, please contact Emergency Operations Center eocsupplies@cpp.edu.

3. Ensure face mask signage is posted in highly visible areas upon entry into your department’s work location. If existing signage needs replacing, you may download materials from the Safer Return website at https://www.cpp.edu/safer-return/materials.shtml.

4. Ensure PPE hubs, either free standing or wall mounted, are stocked with face masks. If the hubs need servicing, please contact EH&S at ehs@cpp.edu.