

CPCS Office Reopening Policies & Procedures

Updated 3/31/21

Introduction

As a result of Covid-19, on March 12, 2020, CPCS announced that all employees who could work remotely were required to begin working remotely no later than March 16. CPCS has provided a number of tools and reimbursements to enable and support staff to work remotely.

In order to reopen our offices, CPCS must comply with Mandatory Workplace Safety Standards for reopening as well as Sector Specific Workplace Specific Safety Standards for Office Spaces to Address Covid-19 (Office Space Standards), both issued by Governor Baker. The Office Space Standards dictate a number of requirements limiting occupancy, requiring face mask use, establishing cleaning protocols, and requiring safety training. In addition, the Office Space Standards require employers to “[l]og everyone who comes in contact with [a] site to enable contact tracing, including temporary visitors (e.g., those doing material drop-offs).” Further, “[i]f the employer is notified of a positive [Covid-19] case at the workplace, the employer shall notify the local Board of Health (LBOH) in the city or town where the workplace is located and assist the LBOH as reasonably requested to advise likely contacts to isolate and self-quarantine.”

CPCS Policies and Procedures

In order to protect the health and safety of our staff, clients, and other visitors, and to comply with the applicable directives issued by Governor Baker, CPCS has adopted the following policies and procedures.

1. Everyone - staff, clients and visitors (delivery people) - must wear masks whenever in a CPCS office. Masks must cover the nose and the mouth. Gaiters do not meet the CPCS mask requirement.
 - a. Exceptions:
 - i. A staff member in an office alone with door closed may remove their mask
 - ii. A staff member who is eating alone at their workspace may remove their mask to eat or drink.
2. Staff are expected to supply their own masks, but disposable masks will be available to staff as needed.
3. CPCS offices will be opened on a staggered schedule by location. While there is a preference for reopening smaller offices first, the order of reopening offices will depend on a variety of factors, including but not limited to: landlord compliance with Covid-19 safety measures for building common areas; the continued ability of staff to successfully work remotely; staff access to parking and any widespread use of public transportation; and the ability to comply with all CPCS Reopening Rules.
4. CPCS will only open an office once personal protective equipment (PPE), Sanitizer, Cleaning Products, and signage are in place.
5. Whenever possible, everyone in an office should maintain physical distancing of at least 6 feet.
6. Kitchens and conference rooms may not be used for eating. Employee eating in the office is limited to an employee's designated work space. Employees must supply their own plates, utensils, mugs, etc. Current office plates, mugs, silverware, pots, pans, etc. should be removed or placed in an inaccessible location.

7. If there are empty offices available, staff seated in cubicles should be moved into empty offices.
8. Cubicles within 6 feet of each other may only be used if the walls are 72 inches high.
9. Employees who have gone to court, jails, prisons, hospitals, client homes, etc. will be permitted to return to the office on the same day as their external visit.
10. All staff meetings should be held virtually – staff physically in the office should also attend staff meetings virtually.
11. Until further notice, there will be no in person visits to offices by staff other than necessary visits by Facilities and IT staff. (SMT members, Managing Directors, etc. will continue to hold virtual meetings with staff in offices other than their own).
12. All non-staff visits (clients, witnesses, delivery people, maintenance people, etc.) must be logged on a daily basis. Offices doors will be locked to ensure logging and that visitors are appropriately masked before entering the office. Each office will post instructions on outside doors advising visitors how to gain entrance to the office.
13. Client, witness, and other case related visits should be restricted to one or more designated conference rooms, preferably close to the entrance. The staff member meeting with a client, witness, or other case related visitor, is responsible for cleaning the conference room before and after the visit. The staff person is also responsible for ensuring that all visitors are appropriately masked. Disposable masks will be available for visitor use. Before office entry, all visitors will be required to certify that they are not suffering from any Covid-19 symptoms as defined by the Centers for Disease Control and Prevention (CDC), including: a fever (100.0°F or higher) or chills; cough; shortness of breath or difficulty breathing; fatigue; muscle or body aches; headache; new loss of taste or smell; sore throat; congestion or runny nose; nausea or vomiting; and diarrhea.
14. Visitors in the waiting area must wear masks. Visitors in waiting areas must maintain a social distance of at least 6 feet.
15. Any staff person using a common area must clean it before and after each use.
16. A sufficient number of conference room chairs should be removed so that everyone will be seated 6 feet apart.
17. No congregating in the hallways or common areas.
18. Staplers, pens, papers clips, etc. should be removed from common areas.
19. In order to assist in required contact tracing, CPCS must log every person who enters a CPCS office each day. All doors into CPCS offices will remain locked. In offices which permit entry by keycard, every staff member will be required to use their own keycard to enter the building to ensure CPCS can accurately log all staff in every building each day. Employees working in offices without keycard access must follow the electronic log in procedure for their office.
20. In order to comply with Governor Baker's directives, each day that an employee goes to a CPCS office the employee will be required to acknowledge, electronically at <https://www.surveymonkey.com/r/CPCSOFFICEADMISSIONCERTIFICATION>, that the employee:
 - a. Is not experiencing any Covid-19 symptoms;
 - b. has not had close contact with an individual diagnosed with Covid-19; and
 - c. has not been asked to self-isolate or quarantine by their doctor or a local public health official.
21. Close contact means "within 6 feet of an infected person for a cumulative total of 15 minutes or more over a 24-hour period starting from 2 days before illness onset (or, for asymptomatic

patients, 2 days prior to test specimen collection) until the time the patient is isolated.” A person is considered to be in close contact with an infected person **even if both individuals are wearing masks.**

22. Ill employees must stay home. If an employee becomes ill at work the employee must go home. Illness includes suffering from any of the following Covid-19 symptoms as defined by the CDC: fever (100.0°F or higher) or chills; cough; shortness of breath or difficulty breathing; fatigue; muscle or body aches; headache; new loss of taste or smell; sore throat; congestion or runny nose; nausea or vomiting; and diarrhea.
23. Employees should notify HR if the employee has Covid-19 symptoms, tests positive, or has had close contact with a person who is known or suspected to have contracted Covid-19.
24. CPCS will notify office staff, close the office, and arrange for an appropriate cleaning before reopening the office when the agency is aware that a person who has tested positive for Covid-19 has been present in an office when considered contagious under CDC guidelines. A person is currently considered contagious beginning either two days before an ill person became symptomatic, or, in the case of an asymptomatic person, two days before test specimen collection.
25. Employees must notify their managers in advance of any planned travel, or as soon as possible of any unplanned travel, to a location which, under Governor Baker’s directives, will require either quarantine for 14 days or production of a negative COVID-19 test result that has been administered no more than 72-hours prior to return to Massachusetts.
26. Managers (AICs and Unit Heads in offices **other than** Federal Street) must draft a return plan for their office, based on the Reopening Plan Template. Plans must be approved by the manager’s supervisor and submitted to the Director of Administration and Operations for final approval.
 - a. The plan should be developed by first considering all tasks which need, or are best, completed in the office, and then determining how office attendance can best be assigned to meet those needs.
 - b. The plan should address how the number of individuals in an office will be limited to no more than 40% of staff assigned to the office.
 - i. Plans may split employees into groups and rotate by day or week;
 - ii. Plans may create “teams” so the same individuals are generally in the office on the same days;
 - iii. Until CPCS determines that the Covid-19 crisis has ended or that offices will return to normal scheduling, plans may permit some employees to work from home and others to work in the office regularly;
 - iv. If an employee is unable to work in the office as a result of personal or household health concerns or as a result of childcare issues, the manager must consult with HR.
 - v. Plans should include staggered arrival and departure times to limit the number of employees who need simultaneous elevator or staircase access.
 - vi. To ensure that all employees are treated equitably, office staffing may not be determined on a “volunteer” basis.
 - c. The plan should detail an electronic system for reserving conference rooms for client and case related visits.

- d. The plan may not place undue burden on administrative assistants or other support staff to meet needs created by Covid-19 reopening plans. All staff must share cleaning responsibilities.
 - e. Managers in the same location should work together to determine:
 - i. Responsibility for logging all non-staff visitors to the office each day;
 - ii. Which, if any, hallways should be limited to one-way traffic;
 - iii. Procedures to avoid crowding at bathrooms, kitchens, and other common areas;
 - iv. Whether stairway use should be limited in any fashion;
 - v. Whether printer use should be limited to a small number of individuals (everyone can print from their desk, but a limited number distribute copies);
 - vi. Responsibility for maintaining signage;
 - vii. Whether employees of co-located offices sit in adjacent cubicles, and if so, coordinate scheduling to avoid same day use;
 - viii. A room reservation system for client and other case related visits;
 - ix. Whether to rotate administrative staff to:
 - 1. Answer phones;
 - 2. Receive and distribute mail;
 - 3. Log necessary office visitors.
25. Before any office opens, a virtual staff meeting will be held to explain the Reopening Rules to all staff members.
26. In accordance with Governor Baker's Directives, all staff members must attend safety training before working in an office that has been reopened.
27. Employee failure to follow PPE/Cleaning protocols or other Reopening Policies & Procedures will be addressed in the same manner as other performance issues.

Restriction on Use of CPCS Offices for Court Hearings

It is the responsibility of the Trial Court to ensure that clients have access to case proceedings. Because it is in our clients' interests for hearings to be conducted in person in courtrooms as soon as that can safely be accomplished, and for the following reasons, CPCS offices may not be used for clients to attend virtual court hearings:

1. CPCS does not have adequate conference room space;
2. Individual CPCS offices cover multiple courts – in some cases attorneys from one office appear in more than 10 different courts - and multiple sessions in larger courts, making it virtually impossible to create a scheduling system to accommodate all or even a substantial minority of our clients' hearings;
3. CPCS does not have space for clients to wait for their hearings while complying with social distancing requirements;
4. CPCS does not have personnel to clean conference rooms between scheduled hearings; and
5. CPCS does not have personnel to address any possible conflicts between clients.