

Mandatory Mask and Face Covering Policy

1. POLICY

Until further notice, no person may enter XYZ Medical Office facilities unless they wear a mask or face covering that covers the nose and mouth. Failure to comply with this rule and the terms of this Policy will be grounds for denial of entrance or immediate removal and, if the violation is committed by an XYZ employee, discipline up to termination in accordance with XYZ Medical Office's progressive disciplinary policies and procedures.

2. PURPOSE

The purpose of this Policy is to prevent the spread of the COVID-19 virus, protect the people present at XYZ Medical Office facilities and ensure compliance with public health guidelines, federal and state laws, local bylaws and other applicable requirements and standards.

3. DEFINITION OF "MASK"

For purposes of this Policy, "mask" means a non-medical facemask, bandana, scarf or any other non-surgical face covering that covers the nose and mouth, ties around the ears or the back of the head, fits snugly against the sides of the face, is secured under the chin and is designed to protect persons other than the wearer. "Masks" **do not** include N95 and other filtered masks required by lab workers nor face masks that protect only the wearer.

4. SCOPE OF POLICY

This Policy applies to all XYZ Medical Office personnel regardless of employment or pay status, couriers, healthcare professionals, patients, contract workers, vendors, customers, clients and visitors (unless they are subject to a specific exemption under Section 5 below) who are present: (i) inside any XYZ Medical Office building or facility, including vehicles and equipment; and/or (ii) in the outdoor areas of such buildings or facilities owned by XYZ Medical Office where people cannot maintain social distancing of at least six feet apart. Masks are not required for:

- Work or time spent alone in a personal office or workspace;
- Walking, exercising or other outdoor activity where individuals are at least six feet apart;
- Driving a single-occupancy vehicle;
- Telework; or
- Other operations, conditions or situations where people are alone in a personal room or space or assembled but still maintain the required six feet social distancing boundaries.

5. EXEMPTIONS

The obligation to wear a mask does not in any way replace or eliminate employees' obligation to use respirators, surgical masks, face shields or any other job-specific personal protection equipment (PPE) required by XYZ Medical Office safe work procedures or OSHA policies. However, face masks are **not required** when:

- A medical professional has advised that wearing a mask may pose a health risk to or impair the breathing of the wearer;
- Wearing a mask would create a health or safety risk to the wearer as determined by federal, provincial or local regulators or OSHA or public health guidelines;
- The person is physically unable to put on or take off the mask without assistance;
- The person has trouble breathing, is unconscious or cannot remove the mask without help;
- The person is deaf or hard of hearing and relies on facial and mouth movements to communicate; or
- The person is a baby or toddler under two years of age.

6. ACCOMMODATIONS

In additions to the above exemptions, XYZ Medical Office will make reasonable accommodations to the point of undue hardship on a case-by-case basis as required by the *Americans with Disabilities Act* and other applicable antidiscrimination and human rights laws.

7. ROLES & RESPONSIBILITIES

7.1 Employer

XYZ Medical Office is responsible for overall implementation of this Policy and will ensure that:

- An ample supply of masks is provided based on an assessment of requirements;
- Mask notification and warning signs are conspicuously posted at facility entrances and other locations;
- Safe and sanitary mask disposal procedures and receptacles are in place; and
- All persons receive proper training and instruction on how to use and launder/dispose of masks; and
- All persons are held accountable for following mask rules.

7.2 Department Heads

Department heads are responsible for:

- Performing an assessment to determine the mask needs of their departments;
- Developing conservation and disposal/laundrying procedures and systems for the department; and

- Ensuring that all personnel and visitors to their department have and properly use required masks.

7.3 Supervisors

Supervisors are responsible for

- Instructing workers and visitors in the proper mask fitting, use, conservation and laundering/disposal;
- Serving as a role model by following the rules themselves;
- Answering employees' mask-related questions; and
- Enforcing mask rules, including via use of discipline when necessary.

7.4 Employees

Employees are responsible for:

- Using the masks supplied by their department—although employees may also buy their own masks at their own expense;
- Following the proper mask use instructions;
- Laundering their own masks/Dropping used masks in designated receptacles for laundering/Properly disposing of their masks;
- Recognizing that masks are in short supply and take the proper steps to conserve them; and
- Reporting mask violations to their supervisors.

8. DURATION OF POLICY

This Policy will remain in effect until public health officials and/or regulators determine that wearing a mask is no longer necessary to prevent the spread of COVID-19 and may be modified by XYZ Medical Office as necessary as the public health emergency and guidelines and regulatory requirements evolve.