COUNTY OF ELBERT

PO Box 7, 215 Comanche St, Kiowa, CO, 80117, 303-621-2341

Chris Richardson, Commissioner District 1
Rick Pettitt, Commissioner District 2
Grant Thayer, Commissioner District 3

May 4, 2020

Colorado Department of Public Health & Environment
Attn: Jill Hunsaker Ryan, Executive Director
4300 Cherry Creek Drive South
Denver, CO 80246

Dear Ms. Ryan,

The Board of County Commissioners as Board of Health for Elbert County asks that you grant the attached request for waiver of certain provisions of Governor Polis's Executive Order D 2020 044 *Safer at Home* and implementing Public Health Order 20-28 *Safer at Home*. We recognize the great effort of your staff to develop baseline guidance that meets statewide needs. Approval of this request will promote the health, safety, and welfare of our county's citizens by allowing more localized actions to simultaneously address the spread of COVID-19, growing mental and behavior health concerns, and support the recovery of our local economy and individual financial wellbeing of our citizens.

We support the comprehensive, local, and phased suppression plan developed by our Public Health Department with input from local stakeholders and the county's COVID-19 Response Team. We find that the requirements for submission for waiver detailed in Appendix G of the current public health order have been met. The plan has clear indicators for consideration of changes to locally approved protective measures and gathering size restrictions, will not overly burden health care providers or facilities, and is supported by a considerable body of state and local data relating to the current pandemic.

Please contact this Board or our Public Health Department if you have any questions regarding the attached waiver request or the details provided in the *Elbert County Plan for Phased Reopening – Localized Suppression of COVID-19 in our Communities.*

Very Respectfully,

Christopher Richardson
Commissioner, District 1

Rick Pettitt
Commissioner, District 2

Grant Thayer
Commissioner, District 3

Elbert County Colorado
Department of Public Health & Environment
Post Office Box 924, Kiowa CO 80117

May 4, 2020

Colorado Department of Public Health & Environment
Attn: Jill Hunsaker Ryan, Executive Director
4300 Cherry Creek Drive South
Denver, CO 80246

Dear Ms. Ryan,

The Board of County Commissioners as Board of Health for Elbert County Colorado, through the Director of Elbert County Department of Public Health & Environment request partial relief from the provisions of Governor Polis's **Executive Order D 2020 044 Safer at Home** and implementing **Public Health Order 20-28 Safer at Home** and such subsequent orders that may be issued (the "State Orders") in accordance with Appendix G: County Variance Requests of PHO 20-28. This county requests explicit exemptions from the statewide application of requirements regarding specific gathering size limits and restrictions placed on operating of certain business categories and types. Relief from these provisions with the controls detailed in the document attached, will allow Elbert County to ensure adequate protections to reduce spread of COVID-19 in our small and widespread communities. Approval will promote the health, safety, and welfare of our County citizens, address growing mental and behavior health concerns, and support the recovery of our local economy and individual financial wellbeing of our citizens.

As the state enters the "Safer at Home" period, Elbert County data regarding the spread of the COVID-19 virus indicates that many portions of our largely rural county can already safely transition to measures more appropriate in the projected follow-on "protect your neighbor" or even near normal activities. Reports of confirmed cases within our County have averaged much less than one per day over the past 50 days, are too few to support statistically valid trend analysis, and are generally limited to a defined area. With near real time data based on medical calls for service by our servicing fire-districts, County Coroner, Sheriff's Office and the police departments in our small municipalities, and monitoring for signs of outbreak at our county jail and two small long-term care facilities, augmented by a local testing capability, we are well positioned to adjust protective measures if a localized increase in cases is observed. Based on these factors, I have determined that the residents of Elbert County will receive greater health benefits from incremental and geographical-based easing of restrictions. With a cumulative positive rate of approximately one-tenth of one percent of total population and just a single death currently attributed to COVID-19, it is clear that reducing restrictions in a measured, rational, and localized manner will not be burdensome to regional or statewide medical capabilities.

The Elbert County Plan for Suppression of COVID-19, delineated in Attachment A, ensures localized application of the appropriate best practices for individuals and businesses consistent with those articulated in the state orders (Appendix A to the county suppression plan). A geographically focused analysis of the presence of COVID-19 in our county with local indicators will allow for a rapid and aggressive response if the situation warrants. Our low volume of COVID-19 cases and the attached plan meet all the requirements for a waiver from your office. Therefore, I am respectfully requesting that you grant Elbert County's request for relief from the above identified restrictions in the state orders.

Respectfully,

Dwayne A. Smith

Dwayne Smith, MEd, MCHES®, CPST
Administrator, Elbert County Public Health
303-621-3202

Enclosure
Attachment A: Elbert County Plan for Phased Reopening – Localized Suppression of COVID-19 in Our Communities

ATTACHMENT A

Elbert County Plan for Phased Reopening - Localized Suppression of COVID-19 in Our Communities

Date of Publication: May 4, 2020
Effective Date: Upon Approval of Waiver to State Orders

1. Purpose: To provide a local decision-making guide for County Public Health Response to incidents of COVID-19. This suppression plan supports data-driven implementation of protective measures that are focused geographically, phased in such a way to prevent localized outbreaks of the disease in our communities, and allows our county to transition over time to full social and economic recovery.

2. Key Elements of Suppression: Successful implementation of this plan depends on:

a. Continuous monitoring of the local situation.

b. Increased local contact tracing.

c. Data-driven and localized implementation of protective measures.

d. Execution of widespread testing once it becomes reliable and economically feasible.

e. Well-defined indicators for review and adjustment of implementation.

f. Localized phasing of collections of measures that provide clarity for citizens and business owners.

g. Robust public communication plan, including via electronic media and direct county-wide mailings to ensure understanding and increase voluntary compliance.

h. Deliberate and regular collaboration with municipalities, school, fire, and other special districts within the county.

3. Background:

As the state enters the "Safer at Home" period, local data regarding the spread of the COVID-19 virus indicates that many portions of our largely rural county can already safely transition to measures more appropriate in the projected follow-on "protect your neighbor" or even near normal activities. Reports of confirmed cases within our county have averaged much less than one per day over the past 50 days (See Figure 1.), are too few to support statistically valid trend analysis, and have been generally limited to a defined area (See Figure 2.).

With near real time data based on medical calls for service by our servicing fire-districts, County Coroner, Sheriff's Office and the police departments in our small municipalities, monitoring for signs of outbreak at our county jail and two small long-term care facilities, and increased testing for COVID-19, we are well positioned to adjust protective measures if a localized increase in cases is observed.

With a cumulative positive rate of under one-tenth of one percent and a single death currently attributed to COVID-19, it is clear that reducing restrictions in a measured, rational, and localized manner will not be burdensome to regional or state-wide medical capabilities.

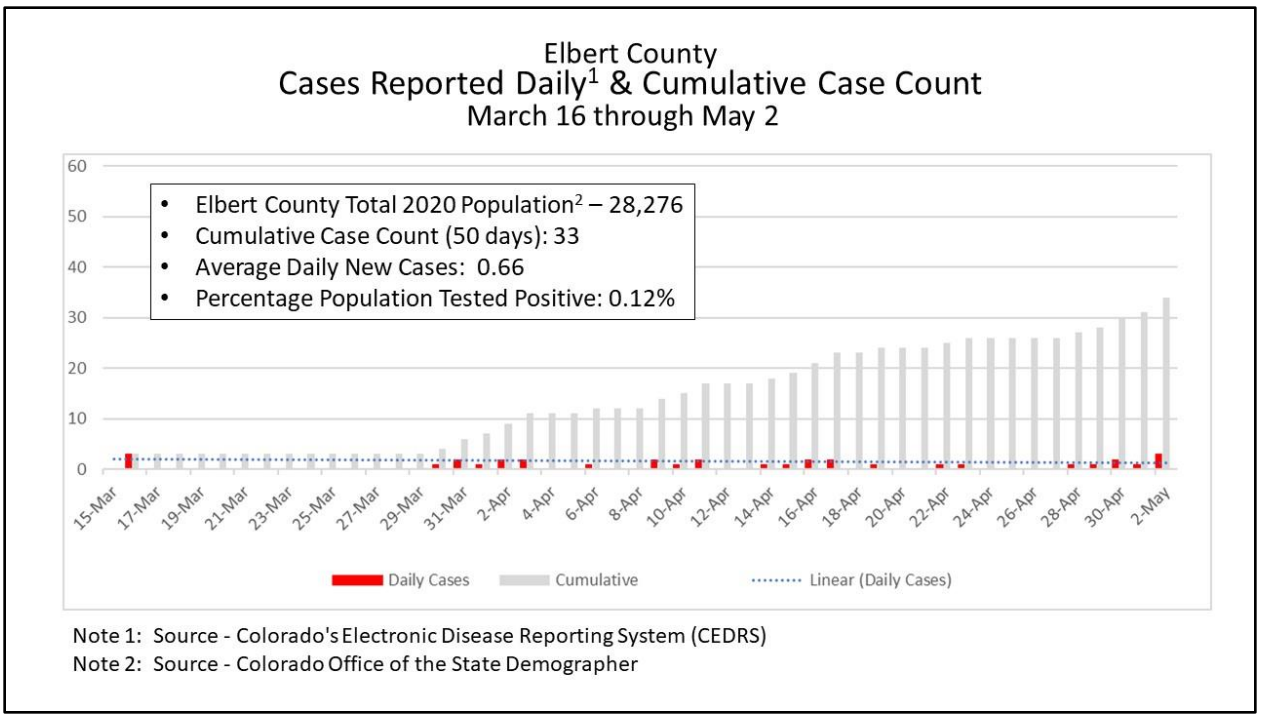

Figure 1.

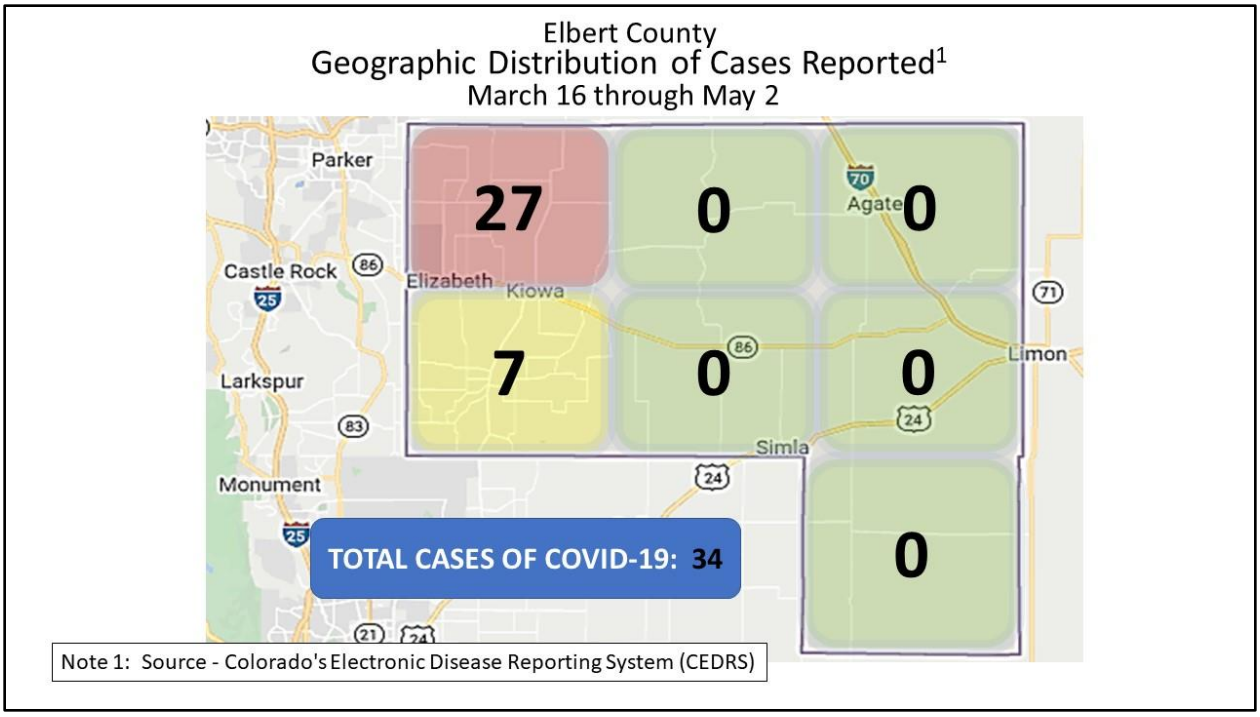

Figure 2.

a. Current COVID-19 Incident Trends:

As of the date of publication, the county has recorded a total of 34 cases based on Colorado's Electronic Disease Reporting System (CEDRS) reporting over a period of 50 days. On two occasions, three positive reports have been received in any one day, one was a family in a single household and

was our first report received on March 16, 2020, the second included a married couple and an additional individual who had been tested eleven days earlier. On eight occasions we have received two positives in a single day, again several of these were two or more weeks from the date the test was administered. The remaining cases consist of sporadic reports of single cases. The reported number of positive cases from all sources is statistically insignificant with no clear trending.

The county has experienced a single confirmed death. This was a male in his 70's with at least two known complicating conditions who was self-isolating. We have had no outbreaks in our county jail or the two group resident nursing homes in the county. A single identified case of a county jail inmate was confirmed after the individual was released on bond and no jail staff or other inmates were impacted.

Figure 2. above provides a representation of the geographic distribution of our cumulative cases in the county. It is clear that our cases have concentrated in the northwest portion of the county. This area is both the highest in population density and is home to our largest number of residents who regularly commuted to the Denver Metro area for work prior to the issue of the "Stay at Home" executive order. The county as a whole has an overall population density of approximately 15 people per square mile. Approximately two-thirds of the entire population are concentrated in the westernmost part of the county. The easternmost 1,200 square miles of the county has a population density of well under 10 people per square mile and have exercised "social distancing" long before the term was conceived.

b. Future Monitoring of Local Data and Trends:

The county will actively and continuously monitor all available sources of information related to the presence of COVID-19 in our county. CEDRS reporting is our primary base of information. This baseline is enhanced by follow-up interviews and contact tracing by public health department staff, medical calls for service data provided by our fire district partners, and encouragement of our citizens to use the online self-reporting tools provided by the state.

The services of Peak Vista Community Health Centers have been engaged to conduct testing on behalf of the county, augmenting our public health capability. Additionally, the county has acquired a quantity of nasopharyngeal swab tests and a laboratory partner that will allow geographic baseline testing throughout the county. As testing made possible through these partnerships is conducted, this data will be added to our syndromic surveillance.

c. Impacts on Local, Regional, and State Medical Capabilities:

There are no urgent care, emergent care, or hospital facilities in Elbert County. However, the hospital care available in bordering counties (that together comprise over 30% of the state's total population) are not measurably impacted by the needs of our county (less than 0.5% of the statewide population). Depending on their location, citizens requiring these services receive treatment at hospitals in Lincoln County (Hugo), El Paso County (Colorado Springs), Douglas County (Parker, and unincorporated Douglas County, Arapahoe County (Aurora), and Denver. Though some of these hospitals have come close to capacity previously, they have easily accommodated our citizens' needs.

Though the county has two small private medical practices and two small in-store clinics that are associated with pharmacies and primarily provide vaccinations, the acute care capability we specifically rely on consists of the EMT and transport capability provided by our seven fire protection district partners. Medical calls for service have remained relatively stable throughout the entire period of this declared emergency and their capacity has not been impacted negatively by COVID-19 exposures.

d. Communications with Citizens, Local Partners, and Businesses:

Since Elbert County's March 16, 2020 Declaration of Emergency related to COVID-19 (one of the first in the state to be issued before a confirmed case of COVID-19), the county has greatly increased our communication efforts. Compliance with public health orders is greatly increased when everyone impacted understands what is expected of them and why.

In order to communicate with citizens, the county has established a public webpage focused on useful and tailored COVID-19 information, increased frequency of *Facebook* social media posts, directed COVID-19 related direct delivery of print information to all county households. The county also uses the *Nextdoor* application as a method to communicate county wide and to tailor communications to specific areas within the county as a whole.

The Public Health Administrator provides a daily email update on COVID-19 to a list serve of over 60 community leaders representing all school districts, municipalities, public safety entities, elected officials and others.

We have leveraged technology to livestream regular Board of Health updates and have conducted interactive Public Health Town Hall meetings.

Board of Health members have participated with municipal leaders in information sharing events with the local Chamber of Commerce and is engaging the Chamber to survey COVID-19 impacts on the local business community.

Numerous regular daily and weekly electronic conferences are conducted with various stakeholder groups to ensure robust two-way information flow between government agencies and entities in the county. Additionally, a daily email update is pushed to each stakeholder entity summarizing local, state, and national actions of importance.

4. Plan Phases:

a. General: The items below apply to all phases of this plan.

(1) Definitions: Unless specifically noted otherwise, terms in this plan are defined in the same manner as in state orders related to COVID-19 response.

(2) Indicators for Review of Protective Measures: The following events will initiate a review of locally approved measures that impact public and private gatherings and business operations. If review indicates measures should be made more restrictive, the public and/or impacted businesses will be notified. If review indicates no change is needed and measures have been in place for 14 days, consideration for reducing measures and/or transition to a new phase may be approved.

(a) Confirmed death from COVID-19 within a region of the county.
(b) Increase in the seven-day rolling average of presumed active cases vs. recoveries.
(c) Outbreak (two or more cases) in county jail or assisted living facilities in county.
(d) Passage of 14 days from implementing adjusted measures or previous review.
(e) Elbert County Board of Health formally directs review of measures in place.

(3) Measures That May Be Adjusted: The following measures may be adjusted locally based on the local situation upon the approval of the County Administrator of Public Health and/or the Elbert

County Board of Health with input and advice of the Public Health Department. Adjustments to measures required may be applied to specific events, individual or broad categories of businesses within a defined region of the county and are subject to review and change if indicators above are met.

(a) Allowed size of public and private gatherings.
(b) Categories and types of businesses that may operate and level of operation allowed.
(c) Specific protective measures that must be employed by businesses while operating (See Appendixes to this plan for details of measures that may be directed.)
(d) Employee and patron health condition screening and reporting.
(e) Citizen and Business Employee testing when/if widespread testing becomes feasible.

b. Phase I: Localizing Safer at Home: The focus in this phase is returning portions of the county, where appropriate, to more normal conditions. In this phase, protective measures and limitations on gatherings, generally consistent with those directed in state orders, will be required in the areas of the county most impacted by COVID-19. In other areas, restrictions may be relaxed and impacts of this will be monitored. Opening of businesses, with selected measures directed (See Appendix A to this plan), may be considered in areas where no cases of COVID-19 have been detected and gathering sizes may be increased to accommodate traditional agricultural activities such as cattle branding. Specific measures may be relaxed upon request and approval of an operating plan for individual businesses. The goal in this phase is to accommodate more normal activities in areas that have had no cases of COVID-19 while reducing cases in areas that have had incidents.

c. Phase II: Localizing Protect Your Neighbor: In this phase, measures and limitations may be even further relaxed based on local conditions and measured trends. Most businesses will likely be allowed to open (including restaurants) while continuing reasonable social distancing requirements and allowing public gatherings of more than 10 people. It is expected that our most vulnerable citizens in the areas most impacted by the virus will remain in isolation. The goal of this phase is a broad reopening of businesses with reasonable measures in place while protecting our most vulnerable citizens. Based on the indicators identified above, all or specific portions of the county or identified businesses may be directed to return to Phase I restrictions.

d. Phase III: Localizing Transition to Near Normalcy: In this phase, businesses will be open with some appropriate measures in place, large gatherings up to 250 people may be approved based on local conditions, and our most vulnerable will be cautioned regarding their participation. During this phase, it is unlikely that very large gatherings that draw attendance from outside the county will be allowed. The goal of this phase is to fully activate our local economy while continuing protections against re-introduction of COVID-19 from the high-density communities that surround Elbert County. Based on the indicators identified above, all or specific portions of the county or identified businesses may be returned to Phase I or II restrictions.

e. Phase IV: Localizing Lifting of Remaining Restrictions: in this phase, consideration of lifting of all restrictions on an area by area basis will be considered. Once all areas of the county have successfully entered Phase 3 for a period of time and we have received no verifiable reports of new cases, consideration of lifting of all protective measures and gathering size restrictions may be lifted. Based on the indicators identified above, all or specific portions of the county or identified businesses may be returned to Phase I, II, or III restrictions.

5. Monitoring for Future Risks/Building Public Health Capacity: Once it has been determined that the initial COVID-19 crisis has passed and all areas of the county have successfully transitioned to Phase IV for a period of time with no sentinel events, focus will shift to monitoring for a potential second wave of COVID-19, building our public health response and medical surveillance capability, continuing education of our citizens, and supporting individual and economic resiliency.

APPENDICIES

A - Selected Protective Measures
B – Colorado Department of Pubic Health & Environment Waiver Approval (TBD)

Elbert County Plan for Phased Reopening - Localized Suppression of COVID-19 in Our Communities
APPENDIX A- Selected Protective Measures

1. Purpose: To provide the baseline protective measures to be considered for operating businesses in Elbert County.

2. General: This document is presented in five parts. The collection of measures that may be considered appropriate are drawn from the state orders pertaining to "Safer at Home" and may be adjusted. Based on phase, geographic area, and data related to incidents of COVID-19, the Director of Public Health may direct many, if not all, of the measures below be taken in order to operate a business or hold an gathering of more than 10 people within the county.

a. Part 1: Retail Business Requirements. These measures are broadly applicable to all retail business and may be tailored by a county public health order for a general category or type of business within regions of the county or applied by the Elbert County Director of Public Health & Environment for a specific business entity.

b. Part 2: Field Services. These are business services generally provided onsite at the client(s) residence or business location and include repairs, inspections, construction and other related services that do not include lengthy close personal contact with the person or persons who engaged the services.

c. Part 3: Personal Services. These are business services generally provided onsite at the client(s) residence or business location and generally include skilled professional services that require lengthy close personal contact with the person or persons who engaged the services.

d. Part 4: Office-Based Businesses. These are non-retail businesses that accept regular walk-in customers and generally serve these customers at a fixed business location.

e. Part 5: Limited Healthcare Settings. The county does not anticipate changing restrictions on this highly regulated businesses. If relaxation of measures pertaining to this business class is warranted, a separate waiver will be submitted to CDPHE in accordance with Appendix G: County Variance Requests of state Public Health Order 20-28 or subsequent orders.

Part 1: Retail Business Requirements
Retailers may be directed to implement some or all of the following protective measures.

A. Retail businesses Retail may be directed to implement the following measures within the workplace to minimize the potential for disease transmission:

1. Elevate and increase frequency of cleaning practices, including cleaning and disinfection of high touch areas.
2. Restrict return policy to only items that can be properly sanitized prior to re-selling.
3. Conduct daily temperature checks and monitor symptoms in employees, logging all results
4. Post signage for employees and customers on good hygiene and other sanitation practices.
5. Maintain 6 foot distancing between patrons and employees;
6. Effectively symptom monitor employees as listed in Section II.I;
7. Provide face coverings, and gloves as necessary and appropriate, to employees;
8. Ensure ability to adequately clean and disinfect both back-room and retail spaces;
9. Provide dedicated, in-store hours for vulnerable or at-risk individuals

10. Limit the number of customers on the premises as needed to make 6 foot distancing between customers attainable;
11. Provide decals and demarcation for waiting area in lines that meet social distancing criteria;
12. Create signage encouraging vulnerable and at-risk individuals to refrain from shopping outside of dedicated hours set aside for those who are more vulnerable or at-risk;
13. Create signage to encourage the use of masks and gloves by customers while on the premises; and/or,
14. Provide hand sanitizer and wipes at entrances and other high-traffic locations to the greatest extent possible.

B. Retailers may be directed to implement some or all of following measures regarding employees to minimize the potential for disease transmission:

1. Provide guidance and encouragement on maintaining 6 foot distancing between both employees and employees and customers;
2. Provide appropriate face coverings and gloves to all employees whenever possible, and also allow employees who can to provide their own appropriate face coverings and gloves for work activities. Employees without face coverings shall not perform tasks that require engagement with the public or with other coworkers;
3. Encourage frequent breaks to allow employees to wash or sanitize their hands;
4. Require employees to stay home when showing any symptoms or signs of sickness; and/or,
5 Provide personal protective equipment (PPE) for employees who are managing deliveries, returns, etc.

C. Employers may be directed to implement the following measure regarding customers to minimize the potential for disease transmission:

1. Require 6 foot distancing measures wherever possible, such as marked space in pick-up lines.

Part 2: Field Services

Elbert County Public Health may direct any and all measures listed below be implemented by Field Service Businesses:

A. Employers may be directed to implement any or all of the following measures regarding employees to minimize the potential for disease transmission:

1. Adhere to all general rules or guidance on social gathering limitations when working out of the office;
2. Implement procedures for field-based employees to monitor for symptoms and report-in to management daily on health status.
3. Comply with the Social Distancing Requirements and maintain a 6 foot distance between employees and from their customers; and/or,
4. Provide gloves and masks for any customer interactions or work being done in third-party home or office spaces;
5. When scheduling or conducting field services, either the employer or an employee must inquire whether third-party homes have individuals symptomatic for COVID-19 or have been in contact with known positive cases, and exercise caution when inside the home and interacting with anyone in the home if they do;

6. Maintain a detailed log of customer interactions to enable contact tracing if it becomes necessary. The log should include name, date, and location of contact, as well as the contact's phone number and/or email address;
7. Require that all tools or equipment be sanitized after each customer visit;.
8. Prioritize work accommodations for Vulnerable Individuals, prioritizing telecommuting; and/or,
9. Provide guidance and encouragement on personal sanitation, including frequently washing hands. This guidance may include all of the following:
    a. frequently and thoroughly wash your hands with soap and water for at least 20 seconds. If soap and water are not available, use hand sanitizer with at least 60% alcohol;
    b. cover coughs and sneezes with a tissue, then throw the tissue in the trash, or use your inner elbow or sleeve;
    c. avoid touching your eyes, nose, and mouth with unwashed hands;
    d. stay home if you're sick, and keep your children home if they are sick; and/or
    e. clean high touch surfaces in your home, and personal items such as cell phones, using regular household products.

B. Employers may be directed to implement any or all of the following measures regarding customers to minimize the potential for disease transmission:
1. Provide estimates, invoices, receipts, and other documentation electronically to negate the need for paper;
2. Provide contactless payment options in the field whenever possible;
3. Encourage customers to maintain 6 foot distancing from field service employees; and/or,
4. Encourage customers to use facial coverings when field services are being conducted.

Part 3: Personal Services
Elbert County Public Health & Environment may direct any and all measures listed below be implemented by Personal Service Businesses:

A. Employers and sole proprietors may be directed to implement some or all of the following measures within the workplace to minimize the potential for disease transmission:
1. Employ strict hygiene guidelines and cleaning and disinfection procedures for all contact surfaces and tools, in accordance with CDPHE Worker and Customer Protection Guidelines for Non-Healthcare Industries;
2. Ensure a minimum of 6 feet of separation between clients and customers, including services for pets, when not directly performing service;
3. Post signage for employees and customers on good hygiene and safety measures being taken; and/or,
4. Minimize in-home and in-facility services with remote alternatives whenever possible, such as drive-by services or virtual meetings.

B. Employers may be directed to implement some or all of the following measures regarding employees to minimize the potential for disease transmission:
1. Services with close personal contact, such as beauty professionals, massage, etc., should implement the following:

a. wear a face covering and gloves at all times, or, if wearing gloves is not feasible or appropriate, meticulous hand washing;
c. change gloves and wash hands between every individual or pet served;
d. clean and disinfect all shared equipment and tools between every individual or pet served; and/or,
e. maintain a detailed log of customer interactions to enable contact tracing if it becomes necessary. The log should include name, date, details of services performed, and location of contact, as well as the contact's phone number and/or email address.

2. Personal services with low personal contact, such as movers or repair services, must implement the following:
   a. maintain a minimum of 6 feet of separation between customers and adhere to social gathering limits of no more than 10 people. For real estate work, open houses are prohibited;
   b. require face coverings and, if feasible, gloves for any customer interactions; and/or,
   c. provide guidance on strict hygiene precautions to employees.

C. Personal Services may be directed to implement some or all of the following measures regarding customers to minimize the potential for disease transmission:

1. Provide customer services by appointment only, do not allow walk-ins or waiting for an appointment, and limit all pet training classes or other activities associated with picking up pets to no more than 10 customers at a time and all following Social Distancing Requirements;
2. Require customers to wear face coverings; if a customer does not have a mask, a "disposable mask" could be provided;
3. Conduct symptoms check for all customers of services with close personal contact and decline to provide services to anyone who has symptoms; and/or,
4. Provide contactless payment options whenever possible.

Part 4: Office-Based Businesses

Elbert County Public Health & Environment may direct any and all measures listed below be implemented by Office-Based Businesses:

A. Less than 100% of in-office occupancy may be directed with appropriate social distancing measures in place.

B. Employers may be direct to implement some or all of the following measures within the workplace to minimize the potential for disease transmission:

1. Ensure a minimum of 6 feet of space between all desks and workspaces;
2. Modify the flow of people traffic to minimize contacts, such as identifying doors for entry or exit only;
3. Conduct standard office cleaning with increased frequency and supplement with sanitization of high touch areas, in accord with CDPHE guidelines;
4. Provide employees with cleaning and disinfecting products and guidance on daily workspace cleaning routines; and/or,
5. Post signage for employees and customers on good hygiene and new office practices.

C. Employers may be directed to implement some or all of the following measures regarding employees to minimize the potential for disease transmission:

1. Maintain in-office occupancy at no more than 50% of total by maximizing use of telecommuting and developing in-office rotation schedules;
2. Minimize the number of in-person meetings and maintain 6 foot distancing in those meetings;
3. Provide guidance and encouragement on maintaining 6 foot distancing and taking breaks to wash hands;
4. Require gloves and masks for any customer interactions; and/or,
5. Allow telecommuting to the greatest extent possible.

D. Employers may be directed to implement some or all of the following measures regarding customers to minimize the potential for disease transmission:

1. Require 6 foot distancing measures wherever possible, such as marked space in check-out lines;
2. Encourage customers to use facial coverings when on the business premises;
3. Provide hand sanitizer at entrances and other high-traffic locations; and/or,
4. Implement hours where service is only provided to Vulnerable Individuals if possible.

Part 5: Limited Healthcare Settings

The county does not anticipate changing restrictions on this highly regulated category of businesses. If relaxation of measures pertaining to this business class (or a single business in this class) is warranted, a separate waiver will be submitted to CDPHE in accordance with Appendix G: County Variance Requests of state Public Health Order 20-28 or appropriate section of subsequent orders. Provided below are the current protective measures required by the state orders. If a waiver is desired please reference the specific measure(s) for which the waiver is requested.

A. Unless a state waiver is granted, employers and sole proprietors of Limited Healthcare Settings must implement the following measures within the overall workplace, including administrative and front office operations, to minimize disease transmission:

1. The practice must have access to adequate PPE in order to sustain recommended PPE use for its workforce for two weeks without the need for emergency PPE-conserving measures. If a practice proposes to extend the use of or reuse PPE, it must follow CDC guidance (https://www.cdc.gov/coronavirus/2019-ncov/hcp/ppe-strategy/index.html)
2. The practice must implement strict infection control policies as recommended by the CDC (https://www.cdc.gov/coronavirus/2019-ncov/hcp/infection-control.html).
3. The practice must ensure a minimum of 6 feet of separation between clients and patients, when not directly performing service, with no more than ten (10) people in the facility;
4. The practice must post signage for employees and patients on good hygiene and safety measures being taken; and
5. The practice must minimize in-home and in-facility services with remote alternatives whenever possible, such as drive-by services or virtual meetings.
6. Practices must maintain a plan to reduce or stop voluntary and elective surgeries and procedures should a surge/resurgence of COVID-19 cases occur in their region.

B. Unless a state waiver is granted, employers of Limited Healthcare Settings must implement the following measures regarding employees to minimize disease transmission:

1. Services with close, direct personal contact must implement the following:
    a. wear medical grade mask and gloves at all times;
    b. change gloves and wash hands between every patient;
    c. clean and disinfect all shared equipment and tools between every patient; and
    d. maintain a detailed log of patient interactions to enable contact tracing if it becomes necessary. The log should include name, date, details of services performed, and location of contact, as well as the contact's phone number
2. Services with low personal contact must implement the following:
    a. maintain a minimum of six 6 feet of separation between customers and limit to no more than ten (10) people in the facility.
    b. require face coverings and, if feasible, gloves for any customer interactions; and
    c. provide guidance on strict hygiene precautions to employees.
3. The practice must require all administrative personnel to wear a facemask, which can be cloth if necessary. Masks may be removed when social distancing of at least 6 feet if possible (e.g., after entering a private office). In order to ensure staff can take off their masks for meals and breaks, scheduling and location for meals and breaks should ensure that at least a 6-foot distance can be maintained between staff when staff needs to remove their mask. It is important for healthcare settings to emphasize that hand hygiene is essential to maintaining employee safety, even if staff are wearing masks. If the facemask is touched, adjusted or removed, hand hygiene should be performed.

C. Unless a state waiver is granted, the Limited Healthcare Settings must implement the following measures regarding customers to minimize disease transmission:

1. The practice must provide services by appointment only, do not allow walk-ins or waiting for an appointment;
2. The practice must require patients to wear face coverings; if a patient does not have a mask, a "disposable medical mask" could be provided;
3. The practice must conduct symptoms checks for all patients, decline to provide services to anyone who has symptoms, and refer them to their primary care physician.
4. The practice must provide contactless payment options whenever possible;
5. The practice must follow social distancing protocols of maintaining at least a 6-foot distance between individuals wherever possible such as in waiting rooms and other small spaces, and should use physical barriers within patient care areas when possible.
6. The practice must appropriately schedule patients, so that providers have sufficient time to change PPE and ensure rooms and equipment can be cleaned and disinfected between each patient.
7. The practice should continue to maximize the use of telehealth and virtual office or clinic visits.
8. The practice should use virtual waiting rooms when possible, with patients who are able to wait in their cars not entering the office until they can be moved immediately to an exam room.
9. The practice should implement source control for everyone entering the office or clinic, including requiring all patients and visitors to wear a cloth mask when entering any healthcare building, and if they arrive without a mask, one should be provided.

D. As best practice, it is recommended that once voluntary and elective surgeries and procedures resume, Limited Healthcare Settings reassess their operations every two weeks, in order to ensure:

1. All of the above approaches and criteria are being met;
2. Procedures are prioritized based on whether their continued delay will have an adverse health outcome.
   a. Voluntary and elective surgeries and procedures should be prioritized based on indication and urgency;
3. Strong consideration is given to the balance of risks versus benefits for patients in higher-risk groups such as those over age 65 and those with compromised immune systems or lung and heart function;
4. All patients are pre-screened for COVID-19 risk factors and symptoms prior to delivering care, via telehealth when applicable; and
5. Compliance with the guidance and directives for maintaining a clean and safe work environment issued by the CDPHE and any applicable local health department for critical businesses is maintained, including compliance with Social Distancing Requirements and all PHOs currently in effect to the greatest extent possible.