



## INTERIM GUIDANCE FOR RELIGIOUS & FUNERAL SERVICES DURING THE COVID-19 PUBLIC HEALTH EMERGENCY

### When you have read this document, you can affirm at the bottom.

As of June 26, 2020

### Purpose

This Interim Guidance for Religious and Funeral Services and Operations of Faith-Based institutions during the COVID-19 Public Health Emergency (“Interim COVID-19 Guidance for Religious and Funeral Services and Operations of Faith-Based Institutions”) was created to provide faith leaders and officiants of religious and funeral services and their employees, contractors, volunteers, and attendees with precautions to help protect against the spread of COVID-19 as religious and funeral services reopen or increase activity. This guidance applies to all religious and funeral gatherings, including burial and committal services.

These guidelines are minimum requirements only, and additional precautions or increased restrictions may be required by the institution or operator. These guidelines are based on the best-known public health practices at the time of publication, and the documentation upon which these guidelines are based can and does change frequently. The Responsible Parties – as defined below – are accountable for adhering to all local, state and federal requirements relative to religious and funeral services. The Responsible Parties are also accountable for staying current with any updates to these requirements, as well as incorporating same into any religious and funeral services and/or Site Safety Plan.

### Background

On March 7, 2020, Governor Andrew M. Cuomo issued Executive Order 202, declaring a state of emergency in response to COVID-19. Community transmission of COVID-19 has occurred throughout New York. To minimize further spread, social distancing of at least six feet must be maintained between individuals, where possible.

On April 15, 2020, Governor Cuomo issued Executive Order 202.17, directing that any individual who is over age two and able to medically tolerate a face-covering must cover their nose and mouth with a mask or cloth face-covering when in a public place and unable to maintain, or when not maintaining, social distance. On April 16, 2020, Governor Cuomo issued Executive Order 202.18, directing that everyone using public or private transportation carriers or other for-hire vehicles, who is over age two and able to medically tolerate a face covering, must wear a mask or face covering over the nose and mouth during any such trip. It also directed any operators or drivers of public or private transport to wear a face covering or mask which covers the nose and mouth while there are any passengers in such a vehicle. On May 29, 2020, Governor Cuomo issued Executive Order 202.34, authorizing business operators/owners with the discretion to deny admittance to individuals who fail to comply with the face covering or mask requirements.

On April 26, 2020, Governor Cuomo announced a phased approach to reopen industries and businesses in New York in phases based upon a data-driven, regional analysis. On May 4, 2020, the Governor provided that the regional analysis would consider several public health factors, including new COVID-19 infections, as well as health care system, diagnostic testing, and contact tracing capacity. On

May 11, 2020, Governor Cuomo announced that the first phase of reopening would begin on May 15, 2020 in several regions of New York, based upon available regional metrics and indicators. On May 29, 2020, Governor Cuomo announced that the second phase of reopening would begin in several regions of the state, and announced the use of a new early warning dashboard that aggregates the state's expansive data collection efforts for New Yorkers, government officials, and experts to monitor and review how the virus is being contained to ensure a safe reopening. On June 11, Governor Cuomo announced that the third phase of reopening would begin on June 12 in several regions of New York.

In addition to the following standards, any Department of Health guidance and directives for maintaining clean and safe work environments must be followed.

Please note that where guidance in this document differs from other guidance documents issued by New York State, the more recent guidance shall apply.

## **Standards for Responsible Religious and Funeral Services in New York State**

No religious and funeral services activity can occur without meeting the following minimum State standards, as well as applicable federal requirements, including but not limited to such minimum standards of the Americans with Disabilities Act (ADA), Centers for Disease Control and Prevention (CDC), Environmental Protection Agency (EPA), and United States Department of Labor's Occupational Safety and Health Administration (OSHA).

The State standards contained within this guidance apply to all religious and funeral services in operation during the COVID-19 public health emergency until rescinded or amended by the State. The operator of the religious or funeral service, or another party as may be designated by the operator (in either case, "the Responsible Parties"), shall be responsible for meeting these standards.

The following guidance is organized around three distinct categories: people, places, and processes.

## **I. PEOPLE**

### **A. Physical Distancing**

- Responsible Parties must ensure that for any religious or funeral service, the congregant/attendee capacity is limited to:
  - In Phase 1 regions, no more than 10 people for any services occurring indoor or outdoor.
  - In Phase 2 and 3 regions, no more than 25% of the maximum occupancy for a particular area as set by the certificate of occupancy for services occurring indoor or no more than 25 people for services occurring outdoor.
  - In Phase 4 regions, no more than 33% of the maximum occupancy for a particular area as set by the certification of occupancy for services occurring indoor or no more than 50 people for services occurring outdoor.
    - If separate buildings are available for use, Responsible Parties may have multiple groups of 10 in separate buildings at the same time in Phase 1; a maximum occupancy of 25% in separate buildings at the same time in Phase 2 and 3; or a maximum occupancy of 33% in separate buildings at the same time in Phase 4 so long as the buildings have separate entrances and exits designated and groups do not interact.

- Responsible Parties must ensure that a distance of at least six feet is maintained amongst all individuals at all times, unless safety of the core activity requires a shorter distance (e.g. pallbearing) or the individuals are members of the same household. However, any singing activity must provide for a distance between individuals of at least twelve feet, subject to additional protective measures. Any time employees, volunteers, and/or attendees must come within six feet of another person, (or twelve feet if singing) acceptable face coverings must be worn, unless they are members of the same household. Employees, volunteers, and/or attendees must be prepared to don a face covering if another person unexpectedly comes within six feet (e.g. when walking to seats). (See below).
  - Acceptable face coverings to protect against COVID-19 include but are not limited to cloth-based face coverings and disposable masks that cover both the mouth and nose.
- Responsible Parties may modify the use and/or restrict the number of stations (e.g. podiums) and seating areas, so that staff members, volunteers, and attendees are at least six feet apart in all directions (e.g. side-to-side, in rows, and when facing one another) and are not sharing stations or seats without cleaning and disinfection between use, unless all individuals are members of the same household (e.g. seating allows household members to sit together, so long as six feet of distance from non-household members). When distancing is not feasible between stations (e.g. sound booths), Responsible Parties must provide and require the use of face coverings and/or enact physical barriers, such as plastic shielding walls, in lieu of face coverings in areas where they would not affect air flow, heating, cooling, or ventilation.
  - If used, physical barriers should be put in place in accordance with OSHA guidelines.
  - Physical barrier options may include strip curtains, plexiglass or similar materials, or other impermeable dividers or partitions.
- Responsible Parties must prohibit the use of small spaces (e.g. vehicles, elevators) by more than one individual at a time, unless all individuals in such space at the same time are wearing acceptable face coverings. However, even with face coverings in use, occupancy must never exceed 50% of the maximum capacity of the space or vehicle, unless it is designed for use by a single occupant. Responsible Parties should increase ventilation with outdoor air to the greatest extent possible (e.g. opening windows and doors), while maintaining safety protocols. Responsible Parties should take additional measures to prevent congregation in elevator waiting areas and limit density in elevators, such as enabling the use of stairs.
- Responsible Parties must put in place measures to reduce bi-directional foot traffic using tape or signs with arrows in narrow aisles, hallways, pews, or spaces, and post signage and distance markers denoting spaces of six feet in all commonly used areas and any areas in which lines are commonly formed or people may congregate (e.g. restrooms, entrances, health screening stations, etc.).
- Responsible Parties must post signs throughout the facility, consistent with DOH COVID-19 signage. Responsible Parties can develop their own customized signage specific to their workplace or setting, provided that such signage is consistent with the Department’s signage. Signage should be used to remind individuals to:
  - Stay home if sick.
  - Cover their nose and mouth with a face covering.
  - Properly store and, when necessary, discard PPE.
  - Adhere to physical distancing instructions.
  - Report symptoms of or exposure to COVID-19, and how they should do so.
  - Follow hand hygiene and cleaning and disinfection guidelines.

- Follow appropriate respiratory hygiene and cough etiquette.
- Prohibit holding or shaking hands of members of different households during services or prayers.

## B. Gatherings in Enclosed Spaces

- Responsible Parties must limit in-person gatherings (e.g. rehearsals, congregational meetings) within the following parameters, and may use other methods such as video, teleconferencing, or drive-in services whenever possible, per CDC guidance "[Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 \(COVID-19\)](#)".
  - In Phase 1 regions, no more than 10 people for any services occurring indoor or outdoor.
  - In Phase 2 and 3 regions, no more than 25% of the maximum occupancy for a particular area as set by the certificate of occupancy for services occurring indoor or no more than 25 people for services occurring outdoor.
  - In Phase 4 regions, no more than 33% of the maximum occupancy for a particular area as set by the certification of occupancy for services occurring indoor or no more than 50 people for services occurring outdoor.
- Responsible Parties must put in place practices for adequate social distancing in small areas, such as restrooms and breakrooms, and should develop signage and systems (e.g. flagging when occupied) to restrict occupancy when social distancing cannot be maintained in such areas; and
- Responsible Parties should stagger schedules for staff members and volunteers to observe social distancing (e.g. six feet of space) for any gathering (e.g. coffee breaks, and shift starts/stops).

## C. Gathering Activity

- Responsible Parties must take measures to reduce interpersonal contact and congregation, through methods such as:
  - limiting in-person presence of staff to only those employees/volunteers who are necessary;
  - holding services outdoors, when possible (e.g. outdoor service for religious gatherings, or graveside-only service for funerals);
  - reducing on-site attendees to accommodate social distancing guidelines;
  - providing remote service options (e.g. live streaming, AM/FM broadcast);
  - allowing drive-in services:
    - Ensure attendees remain in the vehicle in which they arrived.
    - Attendees should not interact physically with clergy, employees, or attendees in other vehicles.
    - Vehicles should contain only members of a single household;
    - Cars must be at least 6 feet apart, or use alternate parking spaces.
  - offering multiple service times, including separate times for vulnerable populations (e.g. those over 70, who have underlying health condition, or those how are immunocompromised);
  - encouraging advanced sign-ups to manage capacity;
  - prioritizing activities that allow for social distancing over those that do not;

- avoiding multiple people and/or teams working in one area by staggering scheduled activities and using signs to indicate occupied areas;
- changing or removing practices that involve close or proximate contact or sharing things among members of different households, such as:
  - sharing a car or limousine ride between locations;
  - providing food and beverages for attendees before, during, or after the event or service.
- Responsible Parties must limit activities involving singing, e.g., a choir, soloist, cantor, or musical ensemble, unless at least 12 feet of separation can be provided between individuals, or additional distancing or physical barriers can reduce transmission of respiratory droplets.

#### **D. Movement and Operations**

- Responsible Parties must establish designated areas for pickups and deliveries, limiting contact to the extent possible.
- Responsible Parties should limit on-site interactions (e.g. designate an egress for individuals leaving the premises and a separate ingress for individuals entering) and movements (e.g. individuals should remain near their stations or seats as often as possible).

## **II. PLACES**

### **A. Protective Equipment**

- Responsible Parties must procure, fashion, or otherwise obtain acceptable face coverings and provide such coverings to their employees while at work at no cost to the employee. Responsible Parties should have an adequate supply of face coverings, masks and other required personal protective equipment (PPE) on hand should an employee need a replacement, or should a visitor or attendee be in need. Acceptable face coverings include, but are not limited to, cloth (e.g. homemade sewn, quick cut, bandana), surgical masks, and face shields.
- Responsible Parties must ensure all attendees wear face coverings that completely cover the nose and mouth unless doing so would be contrary to the individual's health or safety due to medical a condition, or if the attendee is under two years old.
  - Face coverings are required at all times except while seated, provided all individuals are six feet apart except for immediate household members. Faith leaders, officiants, volunteers, and/or attendees must be prepared to don a face covering if another person unexpectedly comes within six feet (e.g. when walking to seats).
- Face coverings must be cleaned or replaced after use and may not be shared. Please consult the [CDC guidance](#) for additional information on cloth face coverings and other types of PPE, as well as instructions on use and cleaning.
- Responsible Parties must allow those performing the religious service or ceremony to use their own acceptable face coverings but cannot require such participants to supply their own face coverings. Further, this guidance shall not prevent employees, officiants, volunteers or attendees from wearing their personally owned additional protective coverings (e.g. surgical masks, or face shields).

- Responsible Parties should consider putting in place measures to limit the sharing of objects, such as religious texts, collection plates, and other materials, as well as the touching of shared surfaces, such as pews, instruments, doors, and railings; or, require employees and volunteers to wear gloves when in contact with shared objects or frequently touched surfaces; or, require employees, volunteers, and attendees to sanitize or wash their hands before and after contact.
- If providing gowns or other garments, Responsible Parties must ensure they are clean and laundered between uses.
- Responsible Parties may implement the following practices to limit the sharing of materials:
  - Place donation plates/boxes in central location with proper distancing protocols in place;
  - Remove religious texts from pews or benches, and encourage congregation to bring their own;
  - If choir/musical ensemble meets enhanced distancing measures, encourage members to launder their own gowns at home, and bring their own instruments, where possible;
  - Adapt certain religious practices that traditionally require close or proximate contact in order to minimize contact between individuals; and/or
  - Empty fonts or other shared water-related service or ceremonial activities.
- Responsible Parties must train employees on how to adequately don, doff, clean (as applicable), and discard PPE, including but not limited to, appropriate face coverings.

## **B. Hygiene, Cleaning, and Disinfection**

- Responsible Parties must ensure adherence to hygiene, cleaning and disinfection requirements as advised by the CDC and DOH, including "[Guidance for Cleaning and Disinfection of Public and Private Facilities for COVID-19](#)," and the "[STOP THE SPREAD](#)" poster, as applicable. Responsible Parties must maintain logs that include the date, time, and scope of cleaning and disinfection.
- Responsible Parties must provide and maintain hand hygiene stations on site, as follows:
  - For handwashing: soap, running warm water, and disposable paper towels.
  - For sanitizer: an alcohol-based hand sanitizer containing at least 60% alcohol for areas where handwashing facilities may not be available or practical.
  - Hand sanitizer must be placed throughout the location for use by all attending or working. It should be placed in convenient locations such as points of entrance/exit.
- Responsible Parties should place signage near hand sanitizer stations indicating that visibly soiled hands should be washed with soap and water; hand sanitizer is not effective on visibly soiled hands.
- Responsible Parties should place receptacles around the facility for disposal of soiled items, including PPE.
- Responsible Parties must provide appropriate cleaning and disinfection supplies for shared and frequently touched surfaces and encourage participants to use these supplies, following manufacturers' instructions, before and after use of these surfaces, followed by hand hygiene.
- Responsible Parties must conduct regular cleaning and disinfection of the location or facility and more frequent cleaning and disinfection for high risk areas used by many individuals and for frequently touched surfaces. Cleaning and disinfection must be rigorous and ongoing and must occur at least after each service. Please refer to DOH's "[Interim Guidance for Cleaning and Disinfection of Public and Private Facilities for COVID-19](#)" for detailed instructions on how to clean and disinfect facilities.

- Responsible Parties must ensure regular cleaning and disinfection of restrooms. Restrooms should be cleaned and disinfected more often depending on frequency of use.
  - Responsible Parties must ensure distancing rules are adhered to by reducing restroom capacity where feasible.
- Responsible Parties must ensure that shared objects are regularly disinfected using registered disinfectants, including at least between services. Refer to the Department of Environmental Conservation (DEC) [list of products](#) registered in New York State and identified by the EPA as effective against COVID-19.
- If cleaning or disinfection products or the act of cleaning and disinfection causes safety hazards or degrades the material (e.g. religious artifact), Responsible Parties must put in place hand hygiene stations between use and/or supply disposable gloves and/or limitations on the number of individuals touching such material.
- Responsible Parties must provide for the cleaning and disinfection of exposed areas in the event of a positive case of COVID-19, with such cleaning and disinfection to include, at a minimum, all heavy transit areas and high-touch surfaces (e.g. pews, religious texts, collection plates, railings, doors and other objects).
- CDC guidelines on "[Cleaning and Disinfecting Your Facility](#)" if someone is suspected or confirmed to have COVID-19 are as follows:
  - Close off areas used by the person suspected or confirmed to have COVID-19.
    - Responsible Parties do not necessarily need to close operations, if they can close off the affected areas.
  - Open outside doors and windows to increase air circulation in the area.
  - Wait 24 hours before you clean or disinfect. If 24 hours is not feasible, wait as long as possible.
  - Clean and disinfect all areas used by the person suspected or confirmed to have COVID-19, such as offices, bathrooms, common areas, and shared equipment.
  - Once the area has been appropriately disinfected, it can be opened for use.
    - Anyone without close or proximate contact with the person suspected or confirmed to have COVID-19 can return to the area immediately after disinfection.
    - Refer to DOH's "[Interim Guidance for Public and Private Employees Returning to Work Following COVID-19 Infection or Exposure](#)" for information on "close or proximate" contacts.
  - If more than seven days have passed since the person suspected or confirmed to have COVID-19 visited or used the facility, additional cleaning and disinfection is not necessary, but routine cleaning and disinfection should continue.
- For funeral related services, Responsible Parties must prohibit touching, hugging, or kissing the body of a deceased person who had confirmed or suspected COVID-19 per CDC guidance, "[Funeral Guidance for Individuals and Families](#)."
- Responsible Parties must prohibit shared food and beverages (e.g. self-serve meals and beverages).

#### D. Phased Reopening

- Responsible Parties are encouraged to phase-in reopening activities so as to allow for operational issues to be resolved before production or work activities return to normal levels. Responsible Parties should consider limiting the number of staff members and volunteers, hours, and number of

attendees available to be served when first reopening so as to provide operations with the ability to adjust to the changes.

#### **D. Communications Plan**

- Responsible Parties must affirm that they have reviewed and understand the state-issued industry guidelines, and that they will implement them.
- Responsible Parties should develop a communications plan for employees, volunteers, or congregants, that includes applicable instructions, training, signage, and a consistent means to provide staff members with information. Responsible Parties may consider developing webpages, text and email groups, and social media.

### **III. PROCESSES**

#### **A. Screening and Testing**

- Responsible Parties must implement mandatory daily health screening practices for employees, faith leaders and volunteers. Responsible Parties are encouraged to offer optional health screenings for attendees.
  - Screening practices may be performed remotely (e.g. by telephone or electronic survey), before the person arrives to the building, to the extent possible; or may be performed on site.
  - Screening should be coordinated to prevent person from intermingling in close or proximate contact with each other prior to completion of the screening.
  - At a minimum, screening must be completed using a questionnaire that determines whether the person has:
    - (a) knowingly been in close or proximate contact in the past 14 days with anyone who has tested positive for COVID-19 or who has or had symptoms of COVID-19;
    - (b) tested positive for COVID-19 in the past 14 days; and/or
    - (c) has experienced any symptoms of COVID-19 in the past 14 days.
- Refer to CDC guidance on "[Symptoms of Coronavirus](#)" for the most up to date information on symptoms associated with COVID-19.
- Responsible Parties must require a person to immediately disclose if and when their responses to any of the aforementioned questions changes, such as if they begin to experience symptoms, including during or outside of work hours.
- In addition to the screening questionnaire, temperature checks of employees may also be conducted per U.S. Equal Employment Opportunity Commission or DOH guidelines. Responsible Parties are prohibited from keeping records of individuals' health data (e.g. the specific temperature data of an individual), but are permitted to maintain records that confirm individuals were screened and the result of such screening (e.g., pass/fail, cleared/not cleared).
- Responsible Parties must ensure that any personnel performing screening activities, including temperature checks, are appropriately protected from exposure to potentially infectious employees or visitors entering the site. Personnel performing screening activities must be trained by individuals who are familiar with CDC, DOH, and OSHA protocols.

- Screeners must be provided and use PPE, including at a minimum, a face mask, and may include gloves, a gown, and/or a face shield.
- An individual who screens positive for COVID-19 symptoms must not be allowed to enter the gathering place and must be sent home with instructions to contact their healthcare provider for assessment and testing.
  - Responsible Parties should provide such individuals with information on healthcare and testing resources.
  - Responsible Parties must immediately notify the state and local health department about the case if test results are positive for COVID-19 and they are so informed by the affected person or persons.
- Responsible Parties should refer to DOH's "[Interim Guidance for Public and Private Employees Returning to Work Following COVID-19 Infection or Exposure](#)" regarding protocols and policies for employees seeking to return to work after a suspected or confirmed case of COVID-19 or after the employee had close or proximate contact with a person with COVID-19.
- Responsible Parties must designate a central point of contact, which may vary by activity, location, shift or day, responsible for receiving and attesting to having reviewed all questionnaires, with such contact also identified as the party for individuals to inform if they later are experiencing COVID-19-related symptoms, as noted on the questionnaire.
- Responsible Parties must designate a site safety monitor whose responsibilities include continuous compliance with all aspects of the site safety plan.
- To the extent possible, Responsible Parties should maintain a log of every person, including employees and visitors, who may have close or proximate contact with other individuals at the gathering site or area; excluding deliveries that are performed with appropriate PPE or through contactless means. The log should contain contact information, such that all contacts may be identified, traced and notified in the event an employee, volunteer, or attendee is diagnosed with COVID-19. Responsible Parties must cooperate with state and local health department contact tracing efforts. The log is not required to maintain a list of attendees.
- Responsible Parties cannot mandate that attendees complete a health screen or provide contact information but may encourage attendees to do so. Responsible Parties may provide an option for attendees to provide contact information so they can be logged and contacted for contact tracing, if necessary.

## B. Tracing and Tracking

- Responsible Parties must notify the state and local health department immediately upon being informed of any positive COVID-19 test result by an employee or faith leader at their site.
- In the case of an employee or faith leader testing positive, the Responsible Parties must cooperate with the state and local health department to trace all contacts in the workplace and notify the state and local health department of all employees and visitors who entered the site dating back to 48 hours before the employee began experiencing COVID-19 symptoms or tested positive, whichever is earlier, but maintain confidentiality as required by federal and state law and regulations.
- State and local health departments will implement monitoring and movement restrictions of infected or exposed persons including home isolation or quarantine.

- Individuals who are alerted that they have come into close or proximate contact with a person with COVID-19, and have been alerted via tracing, tracking or other mechanism, are required to self-report to their employer at the time of alert and shall follow the protocol referenced above.

## IV. OPERATOR PLANS

Responsible Parties must conspicuously post completed safety plans on site. The State has made available a safety plan template to guide in developing plans to protect against the spread of COVID-19, and such plans are adaptable for faith-based institutions to use.

### **Additional safety information, guidelines, and resources are available at:**

New York State Department of Health Novel Coronavirus (COVID-19) Website  
<https://coronavirus.health.ny.gov/>

Centers for Disease Control and Prevention Coronavirus (COVID-19) Website  
<https://www.cdc.gov/coronavirus/2019-ncov/index.html>

Occupational Safety and Health Administration COVID-19 Website  
<https://www.osha.gov/SLTC/covid-19/>

### **At the link below, affirm that you have read and understand your obligation to operate in accordance with this guidance:**

<https://forms.ny.gov/s3/ny-forward-affirmation>