



CHECKLIST FOR CHURCHES – REOPENING for INDOOR SERVICES –

Many pastors and church leaders have reached out to us at Pacific Justice Institute (PJI) with questions about how to safely and legally reopen their churches, following the unprecedented restrictions on everyday life, and on churches in particular, resulting from COVID-19 (novel coronavirus). With regard to safety, the CDC is reporting continued decreases in COVID-19 case rates across the country.¹ As knowledge about COVID-19 has developed, the federal government and its agencies have continued to publish updated guidance, both general and specific to houses of worship. Legally, the U.S. Supreme Court has upheld the constitutional rights of churches and the faithful to gather and pray when these communities take the necessary precautions.² As Justice Gorsuch stated in November of 2020: “It is time—past time—to make plain that, while the pandemic poses many grave challenges, there is no world in which the Constitution tolerates color-coded executive edicts that reopen liquor stores and bike shops but shutter churches, synagogues, and mosques.”³

We have prepared and revised the attached resource to provide a checklist to consult in advance of reopening for indoor worship services, so church leaders can make wise, informed decisions for their congregations.

The checklist emphasizes recommendations to minimize health risks and legal risks in advance of reopening. This checklist draws from recent CDC guidance, federal case precedent, federal guidelines, OSHA guidance, state and local considerations and valuable input from numerous pastors and church leaders. As of May 26, 2021, the CDC reported that 39.7% of the U.S. population (about 131.9 million people) have been fully

¹ Centers for Disease Control and Prevention (CDC), “Trends in Number of COVID-19 Cases and Deaths in the US Reported to CDC, by State/Territory” (May 27, 2021), available at: https://covid.cdc.gov/covid-data-tracker/#trends_dailytrendscases. Approximately 49.7% of the U.S. population (about 165.1 million people) has received at least one dose of the COVID-19 vaccine as of May 26, 2021.

² On April 9, 2021, the U.S. Supreme Court reiterated and emphasized its repeated rejection of California’s unconstitutional attempts to completely close churches: “This is the fifth time the Court has summarily rejected the Ninth Circuit’s analysis of California’s COVID restrictions on religious exercise. See *Harvest Rock Church v. Newsom*, 592 U. S. ___, 141 S. Ct. 889, 208 L. Ed. 2d 448 (2020); *South Bay*, 592 U. S. at ___, 141 S. Ct. 716, 718, 209 L. Ed. 2d 22; *Gish v. Newsom*, 592 U. S. ___, 209 L. Ed. 2d 30 (2021); *Gateway City*, 592 U. S. ___, 209 L. Ed. 2d 178. I.” *Tandon v. Newsom*, 141 S. Ct. 1294, 1297-98 (2021).

³ *Roman Catholic Diocese v. Cuomo*, 141 S. Ct. 63, 72 (2020) (Gorsuch, J., concurring).



vaccinated.⁴ Because the majority of the population is not fully vaccinated,⁵ these guidelines are written on the assumption that an entire church congregation is not fully vaccinated, with notations to suggest alternatives for those who are fully vaccinated. Please use this resource in conjunction with other resources, including those available at our website: www.pji.org.

PJI also hosts regular, invitation-only Zoom calls to provide specific legal and practical updates for pastors and churches. Please register online to receive an invitation and to participate in the live Q&A portions.

These updated guidelines are not suggested as permanent church policies. Rather, they are suggestions for implementation based upon current federal guidance to be considered in conjunction with state and local guidance, as well as applicable legal regulations.

PJI has been advising numerous church leaders navigating this crisis. For over twenty years, we have assisted thousands, including church leaders and pastors, with a wide range of issues involving religious freedom and civil rights. PJI is a non-profit 501(c)(3) legal defense organization that works diligently, ***always without charge***, to provide our clients with all the legal support they need. We have tremendous leverage in our litigation budget with multiple offices throughout California, Oregon, Washington, Nevada, Colorado, Texas, Ohio, Mississippi, Florida, and New York, and the *largest Affiliate Attorney Network* on the West Coast – hundreds nationwide!

The dynamic nature of the pandemic makes this situation fluid and subject to continuing updates. Please reach out to us directly with any questions you may have regarding compliance with your state and local guidelines.

Please do not hesitate to reach out and **contact Pacific Justice Institute toll free at 888-305-9129.**

Sincerely,

Brad Dacus, President

⁴ CDC, “COVID-19 Vaccinations in the United States” (May 26, 2021), available at: <https://covid.cdc.gov/covid-data-tracker/#vaccinations>.

⁵ An individual is fully vaccinated, per the CDC, two weeks after receiving either the Johnson & Johnson’s single-dose vaccine or after the second dose of the two-dose series made by Pfizer-BioNTech and Moderna. CDC, “When You’ve Been Fully Vaccinated” (May 16, 2021), available at: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated.html>.



CHECKLIST FOR CHURCHES

– INDOOR SERVICES –

May 27, 2021

I. Plan and Prepare: Church Leadership and Administration

A. ☐ CDC and Federal Guidelines

1. Visit the website for the CDC⁶ regularly to see the latest updates on COVID-19: www.cdc.gov/coronavirus. On May 13, 2021, the CDC published a pivotal change in its guidance: those who are fully vaccinated⁷ do not generally need to engage in physical distancing or wear a mask when in public, subject to specific exceptions.⁸ The majority of the U.S. population, however, is not yet fully vaccinated as of May 25, 2021.⁹ The CDC, for unvaccinated people, generally recommends that part of social distancing is limiting face-to-face contact with other people and staying at least six (6) feet, or about two (2) arms' length, from other individuals, except for individuals with whom you live (Households or Cohorts).¹⁰
2. Review the CDC's "Considerations for Communities of Faith," which the CDC updated February 19, 2021.¹¹ Please note that the CDC states the following: "CDC offers these suggestions for faith communities to consider and accept,

⁶ Centers for Disease Control and Prevention (CDC).

⁷ An individual is fully vaccinated, per the CDC, two weeks after receiving either the Johnson & Johnson's single-dose vaccine or the two-dose series made by Pfizer-BioNTech and Moderna. CDC, "When You've Been Fully Vaccinated" (May 16, 2021), available at: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated.html>.

⁸ CDC, "Interim Public Health Recommendations for Fully Vaccinated People" (May 13, 2021), available at: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated-guidance.html>.

⁹ CDC, "COVID-19 Vaccinations in the United States" (May 26, 2021), available at: <https://covid.cdc.gov/covid-data-tracker/#vaccinations>.

¹⁰ The CDC explains that "Social distancing, also called "physical distancing," means keeping space between yourself and other people outside of your home." The CDC advises that part of practicing social or physical distancing includes staying at least six (6) feet, or about two (2) arm lengths, between you and individuals outside of your home (non-Household individuals). Individuals with whom you live in your home are considered part of your "Household" or "Cohort" for social distancing purposes. More information from the CDC is available at: <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/social-distancing.html> (updated Nov. 17, 2020).

¹¹ CDC, "Considerations for Communities of Faith" (Feb. 19, 2021), available at: https://www.cdc.gov/coronavirus/2019-ncov/community/faith-based.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fphp%2Ffaith-based.html; see also CDC, "Considerations for Events and Gatherings" (May 20, 2021), available at: <https://www.cdc.gov/coronavirus/2019-ncov/community/large-events/considerations-for-events-gatherings.html>.



- reject, or modify, consistent with their own faith traditions, in the course of preparing to reconvene for in-person gatherings while still working to prevent the spread of COVID-19.” Because the CDC has not revised these specific guidelines since February, they do not yet incorporate the updated guidance from the CDC for fully vaccinated people that was released on May 13, 2021.
- Review federal guidance, available at: www.coronavirus.gov. In a nutshell, all individuals are advised to (a) engage in social distancing when not fully vaccinated, (b) wear a Face Covering when in public and not fully vaccinated and (c) wash their hands regularly (or, when not possible, use hand sanitizer).
 - Review the below CDC guidance on masking and various activities:¹²

Unvaccinated People		Examples of Activities	Fully Vaccinated People
		Outdoor	
Safest		Walk, run, wheelchair roll, or bike outdoors with members of your household	
		Attend a small, outdoor gathering with fully vaccinated family and friends	
		Attend a small, outdoor gathering with fully vaccinated and unvaccinated people	
Less Safe		Dine at an outdoor restaurant with friends from multiple households	
Least Safe		Attend a crowded, outdoor event, like a live performance, parade, or sports event	
		Indoor	
Less Safe		Visit a barber or hair salon	
		Go to an uncrowded, indoor shopping center or museum	
		Attend a small, indoor gathering of fully vaccinated and unvaccinated people from multiple households	
Least Safe		Go to an indoor movie theater	
		Attend a full-capacity worship service	
		Sing in an indoor chorus	
		Eat at an indoor restaurant or bar	
		Participate in an indoor, high intensity exercise class	

¹² CDC, “Choosing Safer Activities” (May 27, 2021), available at: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/pdfs/choosingSaferAct.pdf>; see also, <https://www.cdc.gov/coronavirus/2019-ncov/daily-life-coping/participate-in-activities.htm>.



B. ☐ State Guidelines

5. Review all relevant state guidelines regarding churches, gatherings, and social distancing.¹³
6. Review PJI state-specific memos as relevant to your church, available at: www.pji.org; obtain legal or other professional advice as necessary as each state has continued to develop and modify its rules through the pandemic. If you live in a jurisdiction, state or local, that requests or requires businesses (including non-profits such as churches), to confirm each individual's vaccination status, please reach out directly to PJI through the "request help" tool on the PJI website.¹⁴ PJI will provide you with advice specific to your church's particular circumstances, as this will vary depending on the nature of the state or local health order.
7. Reach out before reopening for worship services to seek relevant assistance from legal and other professionals and situation-specific advice. PJI also hosts regular Zoom calls to address recent developments in the courts and the law, which may be accessed online for a limited period of time.¹⁵

C. ☐ Local Guidelines

8. Review any local guidelines, including orders or mandates from the county local health officer, relevant to your church (see I.B.6 above).¹⁶
9. Reach out to local law enforcement in advance of a service, if there are concerns regarding compliance with applicable regulations.

D. ☐ Insurance Policies and Compliance

10. Review any relevant insurance policies relating to your church, employees and facilities.

¹³ The CDC provides a directory of state public health authorities, available at: <https://www.cdc.gov/publichealthgateway/healthdirectories/index.html>.

¹⁴ State-specific memos addressing coronavirus-related restrictions are available at: <https://www.pacificjustice.org/resources/for-churches/other-helpful-resources-2/legal-insider-covid-19/>. Please reach out directly to PJI with questions at: <https://www.pacificjustice.org/get-help/request-legal-assistance/>. These memos are a starting point to explain the 'state of emergency' statutes operative in each state. While the specific rules implemented under these statutes have changed over the months, the underlying legislation in each state has, for the most part, not changed significantly. Some court cases have, however, started to successfully challenge the validity and/or scope of these 'state of emergency' statutes as well. See, *In re Certified Questions from the United States Dist. Court (Midwest Institute of Health, PLLC v. Governor)*, No. 161492, 2020 Mich. LEXIS 1758 (Oct. 2, 2020), available at: <https://courts.michigan.gov/Courts/MichiganSupremeCourt/Clerks/Documents/2020-2021/161492/In%20re%20Certified%20Questions-OP.pdf>.

¹⁵ See, PJI, "Recent Zoom Calls," <https://www.pacificjustice.org/resources/for-churches/recent-zoom-calls/>.

¹⁶ In addition to a directory of state public health authorities, the CDC also includes a directory of local public health authorities, available at: <https://www.cdc.gov/publichealthgateway/healthdirectories/index.html>.



11. Communicate directly with your policy provider if you have any questions or need clarity on your policy.
12. Review and revise your employee handbook, as necessary, to include guidance on social distancing and updated policies and procedures.
13. Review expectations with pastors, staff, choir members, ushers, volunteers and other members of the worship team (Worship Team) in advance of service. For example, review facial covering/mask requirements, social distancing guidelines and the importance of regular hand washing with soap and water for at least 20 seconds.¹⁷
14. Review social distancing expectations with Worship Team. For example, if not fully vaccinated, the Worship Team should each maintain at least six (6) feet of space between each person and unvaccinated individuals should¹⁸ wear masks or face coverings as described by the CDC (Face Coverings)¹⁹ throughout the church service.
15. Consider whether members of your Worship Team who will be moving in the public space during the service should wash the clothing, immediately prior to the service, that they will wear at the service.
16. Document updates to policies and all meetings held with employees and volunteers to share this information.

E. ☐ Local Outreach

17. Discuss local considerations with other churches to collaborate and share concerns and ideas.
18. Consider reaching out to any neighbors near your church who may have questions about your reopening for a church service; open a dialogue with neighbors (particularly those who may be hostile to reopening the church) to address and respond to any concerns they may have in advance of the service.
19. Have a specific, written statement prepared in advance for the press, should the reopening of your church receive requests for a statement or other media attention.

¹⁷ Please review the CDC Guidance on hand washing, available at: <https://www.cdc.gov/handwashing/when-how-handwashing.html>.

¹⁸ The CDC recommends that unvaccinated people wear masks in public settings, including religious gatherings, and anywhere they will be around other people. CDC, “Considerations for Wearing Masks” (April 19, 2021), available at: <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cloth-face-cover-guidance.html>.

¹⁹ CDC, “Use of Masks to Help Slow the Spread of COVID-19” (Feb. 16, 2021), available at: <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html>. See also, CDC, “How to Store and Wash Masks” (Oct. 28, 2020), available at: <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/how-to-wash-cloth-face-coverings.html>.



F. ☐ Clean and Disinfect

20. Review and follow CDC guidelines to disinfect interior spaces thoroughly²⁰ using EPA-approved disinfectants for COVID-19 (List N).²¹ The EPA has also created a search tool that can help you identify the appropriate List N cleaning product for a specific surface.²²
21. Review and follow available state guidelines on cleaning interior spaces and surfaces.
22. Consider how long offices and/or buildings have been closed. An extended period of closure or reduced operations for a building may create additional facility issues when preparing to reopen. Accordingly, the CDC has prepared a guidance document to outline some areas for consideration.²³ Significant preparation and even a “deep- cleaning”²⁴ may be an appropriate precaution for your church at various stages; expect that this will take multiple hours and be prepared to document this with the use of professional services.
23. Outline and follow a set of specific and thorough cleaning procedures before and after every service or other use of the indoor space.
24. Consider whether the bathroom will need to be cleaned after each individual use.

II. Send Invitations to Parishioners

G. ☐ Send Invitations to Parishioners

25. Consider sending direct invitations to parishioners in advance of a planned service, especially if not all in your community are aware that your church has or will reopen for indoor services. Include the church’s expectations regarding safety precautions, highlighting the importance of social distancing and Face Coverings, as appropriate, for unvaccinated individuals.

²⁰ CDC, “Cleaning And Disinfecting Your Facility” (Oct. 10, 2020), available at:

<https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility-H.pdf>.

²¹ EPA, “List N: Disinfectants for Coronavirus (COVID-19),” available at: <https://www.epa.gov/pesticide-registration/list-n-disinfectants-coronavirus-covid-19>.

²² EPA, “List N Advanced Search Page: Disinfectants for Coronavirus (COVID-19)” (Updated May 25, 2021), available at: <https://www.epa.gov/pesticide-registration/list-n-advanced-search-page-disinfectants-coronavirus-covid-19>.

²³ See CDC, “Guidance for Reopening Buildings After Prolonged Shutdown or Reduced Operation” (Sept. 22, 2020), available at: <https://www.cdc.gov/coronavirus/2019-ncov/php/building-water-system.html>.

²⁴ A deep cleaning is most appropriate where there has been a confirmed COVID-19 case, or the facility has been closed for a significant period of time. NB: A court in Kansas granted a TRO to enjoin enforcement of an order closing churches, but required, *inter alia*, a deep cleaning of the church (*First Baptist Church v. Kelly*, No. 20-1102-JWB, 2020 U.S. Dist. LEXIS 68267 (D. Kan. Apr. 18, 2020)).



26. Include pre-attendance guidance on your church's website and in any direct mailings with invitees; include guidance from CDC, state and local guidelines, and this checklist.
27. Know in advance expected turnout to plan interior layout of church; revise plans for a scheduled service based upon RSVP responses with planned accommodations for possible visitors, if necessary.
28. Consider, based upon your community, whether having seating arranged to enable those who wish or need to wear Face Coverings to sit in a designated area. In communications to your community, embrace the needs of those who medically must or simply wish to wear Face Coverings to ensure that all are fully welcome at your services.
29. Consider a "soft launch" service with a very limited number of individuals, as well as a rehearsal prior to the service, before expanding the number of invitations sent to parishioners.
30. Depending on the size of your congregation and applicable state/local rules, consider asking or assigning parishioners to attend specific services to control numbers at services.

H. ☐ General Advice for Invitees

31. Remind invitees to continue to follow applicable restrictions from state and local orders before and after a scheduled service.
32. Remind invitees to follow all CDC and state guidelines on social distancing and Face Coverings for those who are unvaccinated and, of course, good hygiene and hand washing for all.
33. Advise any individual who is "at increased risk for severe illness" of the CDC's recommendations to take extra precautions;²⁵ the CDC includes in this category older adults,²⁶ women who are pregnant and individuals with certain medical conditions (including, for example, asthma, HIV, diabetes, obesity, cardiovascular disease and/or cancer).²⁷
34. Advise invitees of all potential risks to provide them with the fullest amount of information and safety advice available; include this risk advisory with the invitation to parishioners.

²⁵ CDC, "People at Increased Risk" (Apr. 20, 2021), available at: https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/index.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fneed-extra-precautions%2Fpeople-at-increased-risk.html.

²⁶ CDC, "Older Adults" (May 14, 2021), available at: <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/older-adults.html>.

²⁷ CDC, "People with Certain Medical Conditions" (May 13, 2021), available at: https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fneed-extra-precautions%2Fgroups-at-higher-risk.html.



I. ☐ Specific Advice for Invitees

- 35. Ask invitees to confirm that no member planning to attend is known to have had any contact with known COVID-19 confirmed cases in the past 21 days.
- 36. Include in the invitation a specific “To Do Checklist” for all attendees; this will provide invitees with advice for before, during and after the service.
- 37. If invitees are asked to confirm attendance in advance, ask invitees to RSVP at least 24-hours in advance of the scheduled service, to facilitate planning by church leadership.
- 38. If invitees are asked to confirm attendance in advance, advise invitees that they are welcome to attend without an RSVP, but their seating may not be guaranteed, and they may need to attend ‘virtually’ from their car or home if space capacity is reached.

J. ☐ Explain Expectations and Social Distancing Protocols

- 39. Detail planned procedures for entering and exiting parking lots; include a map with arrows showing flow of traffic, if appropriate.
- 40. Detail planned procedures for entering and exiting the church building; include a map with arrows showing flow of foot traffic and aisles, if appropriate.
- 41. Advise attendees not to engage in hand shaking or physical contact between Households as part of practicing social distancing.
- 42. Explain social distancing protocols in advance and ask families to discuss this guidance with their children; ask parents to consider whether these expectations are reasonable for their children in advance of attending the service.

K. ☐ Include a List Addressing “To Do Before the Service”

- 43. Ask parishioners to take temperature checks at their homes prior to attendance; ask parishioners to stay home if they have a fever or flu-like symptoms²⁸ and seek appropriate medical advice.
- 44. Ask parishioners to seek medical advice if they believe they may have a relevant underlying medical condition as defined by the CDC,²⁹ prior to undertaking any activity outside of the home.

²⁸ The CDC issued the following advice on looking for symptoms of illness: “People with COVID-19 have had a wide range of symptoms reported – ranging from mild symptoms to severe illness. Symptoms may appear **2-14 days after exposure to the virus**. People with these symptoms may have COVID-19: fever 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. This list does not include all possible symptoms. CDC will continue to update this list as we learn more about COVID-19.” CDC, “Symptoms of Coronavirus” (Feb. 22, 2021), available at: <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>.

²⁹ *Supra*, notes 24-26.



45. If the church is unable to increase how frequently it cleans and sanitizes restrooms, ask parishioners to refrain from food/drink immediately prior to service, unless medically necessary.
 46. Ask parishioners to use bathroom immediately prior to leaving their homes to attend the service.
 47. Consider whether to ask parishioners to wash the clothes they will wear to the service prior to their attendance.
 48. Ask attendees to bring Face Coverings³⁰ and any other PPE they may want (some individuals may be uncomfortable with the change in CDC advice that enables fully vaccinated individuals not to wear masks.)³¹ If helpful for your community, provide links to medically sound tutorials³² on how to create homemade Face Coverings. The CDC has also provided specific information on how to select, make, wear, store, and wash masks.³³
- L. ☐ Include a List Addressing “To Do After the Service”**
49. Consider reminding all attendees to wash the clothing they wore to the service again after the service.
 50. Ask individuals to contact the church immediately if they experience any flu-like or other COVID-19 symptoms³⁴ and to seek medical advice. Pre-designate a point person (a “Covid Point Person”) to handle such any such cases.
 51. Invite attendees to share reflections, comments and suggestions directly with church leadership to foster ongoing dialogue as your community transitions back to regular worship services.
- M. ☐ Post All Advice Publicly and Outside Church as a Reminder**
52. Make signs visible for individuals with explanations of the protocol for the service, including social distancing and Face Coverings.
 53. Posted signs should be consistent with the advice provided in previously sent invitations to parishioners.
- N. ☐ Answer FAQs in Advance**
54. Have a direct line of communication open to attendees in advance of the service for any FAQs.

³⁰ *Supra*, notes 17-18.

³¹ Personal Protective Equipment (PPE).

³² See, e.g., U.S. Surgeon General Dr. Jerome Adams, “How to Make Your own Face Covering” (Apr. 4, 2020), available at: <https://www.youtube.com/watch?v=PI1GxNjAjlw>.

³³ *Supra*, notes 17-18.

³⁴ *Supra*, note 27.



- 55. Include a designated individual, phone number, email address or website in the invitation you mail or post online to facilitate dialogue and prepare parishioners for changes in your worship service format, as compared to previous services. Community feedback should also be shared with the church's "Covid Point Person" (see item II.L.50 above).
- 56. Be prepared to respond to questions and adapt plans as relevant concerns arise; weather may be an additional consideration requiring flexibility.

III. Physical Layout: Interior Space and Outdoor Parking

O. ☐ Reduce Total Seating to Facilitate Social Distancing between Households

- 57. Plan to reduce attendance numbers for any service to facilitate social distancing for those who are unvaccinated, with consideration for times when individuals are standing, sitting, entering and exiting the building. Review confirmed attendance from invitees and plan to space seating accordingly.
- 58. If pews are used for seating, use only every other (or every third) pew to facilitate at least six (6) feet distancing between individuals or Households for areas where unvaccinated individuals are seated.
- 59. If individual chairs are used for seating, use only every other (or every third) row of seating to facilitate at least six (6) feet distancing between rows of individuals or Households for areas where unvaccinated individuals are seated.
- 60. If necessary, close any vestibule, foyer or other common spaces to discourage social congregating before or after the service for unvaccinated individuals.
- 61. Consider making "I sat here" cards available for individuals, so that they can indicate where they sat during a service. This can help churches with sanitizing after a worship service.

P. ☐ One-Way Only Entrance/Exit Doors and Aisles

- 62. Prop doors open to the church to avoid physical touching of door handles, if possible.
- 63. Clearly mark one-way only foot traffic inside the building; aisles between pews/chairs should be one-way only, with taped arrows or other clear indicators on the floor.
- 64. Clearly mark one-way only traffic for individuals to go to and from their vehicles if there is a parking lot attached to the church.
- 65. Mark an "entrance-only" door (or doors) and an "exit-only" door (or doors); these entrance-only and exit-only doors should be on opposite sides of the building.



- Q. ☐ Use Tape to Mark Spacing, Both Inside for Seating and Outside for Parking**
- 66. Mark out spacing for pews/seating with a minimum of six (6) feet in between individuals or Households for areas where unvaccinated individuals are seated.
 - 67. Individuals or families that live together (Households) may sit closer together but allow the maximum social distancing possible in between individuals or Households for areas where unvaccinated individuals are seated.
- R. ☐ Configure Physical Space in Advance, Particularly to Increase Ventilation**
- 68. Increase ventilation as much as possible, opening windows and doors, weather allowing. The CDC has provided updated guidance on ventilation for buildings.³⁵
 - 69. Consider not using central heating or cooling, weather allowing; replace standard grade air filters with HEPA³⁶ filters, if possible.
 - 70. Close any adjacent rooms or spaces not necessary for the worship service to encourage proper social distancing before and after the service.
 - 71. Remind unvaccinated attendees not to socialize without proper physical distancing and Face Coverings in the parking lot or other public spaces after the service.
- S. ☐ Modify Bathroom Space in Advance**
- 72. Post signs on bathroom doors reminding parishioners they are only to be used in case of necessity.
 - 73. Prop main door open (to avoid touching door handles) if there are individual stalls/urinals.
 - 74. If there are multiple bathroom stalls, close every other stall (with tape or signs) so that they are not to be used to maximize social distancing.
 - 75. If there are multiple bathroom sinks, close every other (with tape or signs) in order to maximize social distancing.
 - 76. As per invitations to parishioners, bathrooms should only be used in case of emergency if they cannot be cleaned and sanitized with increased frequency.
 - 77. Consider reducing the length of your service to accommodate the physical needs of parishioners, especially older and younger individuals, as well as those who still must wear Face Coverings.

³⁵ CDC, “Ventilation in Buildings” (Mar. 23, 2021), available at: <https://www.cdc.gov/coronavirus/2019-ncov/community/ventilation.html>; *see also*, American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE), Lawrence J. Schoen, P.E., “Guidance for Building Operations During the COVID-19 Pandemic” (May 2020) (as referenced by the CDC), available at: https://www.ashrae.org/file%20library/technical%20resources/ashrae%20journal/2020journaldocuments/72-74_ieq_schoen.pdf.

³⁶ High-efficiency particulate air (HEPA) filters.



T. ☐ Carefully Consider Whether To Distribute or Pass Physical Items

- 78. If a form of communion is administered, do not require parishioners to touch a plate, food or cup that is also touched by another individual; consider the use of individual, prepackaged communion if compatible with your faith tradition.
- 79. Avoid direct physical contact between households; remind parishioners to refrain from embracing, shaking hands or other forms of physical contact.
- 80. Consider alternatives to the distribution of physical bulletins. Creating or enhancing your church's online (website, email, and social media) presence can extend your presence throughout the community year-round.
- 81. Consider alternatives to passing a physical collection plate, basket or other offering during the service. Verified and reliable online donation platforms through the church's website can be a great year-round resource.
- 82. Make online donations available before and after the service; make a tithe drop box available for parishioners to deposit tithes when entering and/or exiting the church.

U. ☐ Have PPE, including Face Coverings, Available for One-Time Use

- 83. Make Face Coverings available for one-time use for individuals wishing to attend a worship service but without their own Face Covering.
- 84. Offer hand sanitizer throughout the building; the CDC recommends sanitizer have a minimum of 60% alcohol.³⁷

V. ☐ Prepare with your Worship Team in advance

- 85. Keep your Worship Team, including choir members, physically spaced to observe proper social distancing for those who are unvaccinated.
- 86. Wear Face Coverings at all times, including when singing and preaching if unvaccinated.
- 87. As a potential alternative to wearing a Face Covering while preaching and unvaccinated, create a plexiglass partition for the pulpit and speak only from this protected area during public speaking portions (similar to partitions devised for grocery stores and other public-facing businesses).
- 88. If ministers use wearable or portable microphones, do not share these devices between individuals; clean and disinfect microphones before and after use.

³⁷ CDC, "Cleaning and Disinfecting Your Home" (Apr. 5, 2021), available at: <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/disinfecting-your-home.html>.



W. ☐ Be Prepared to Promptly End the Service if Necessary

- 89. If church leadership becomes aware of a clear, immediate or imminent threat to the safety of the attendees or if church leadership becomes unable to follow the protocols listed above, be prepared to promptly disband the service.
- 90. Prepare in advance to enable an orderly end of the service, if necessary, before the scheduled conclusion of the service.
- 91. Identify space that can be used to separate a person who may feel or become ill.

IV. After the Service

X. ☐ Remind Invitees of the “To Do List: After the Service”

- 92. Consider reminding all attendees to take the clothing they wore to the service and wash it again after the service; advise Worship Team to follow the same guidelines as other attendees.
- 93. Ask any individual to contact the church’s “Covid Point Person” immediately and to seek medical advice if they experience flu-like or other COVID-19 symptoms (see II.L.50 above).³⁸
- 94. Update your emergency operations plan with the help of your local public health department, emergency operations coordinator or planning team and other relevant partners to include COVID-19 planning.
- 95. Consult OSHA³⁹ guidelines, particularly in relation to employees.⁴⁰

Y. ☐ To Do List for Church After the Service

- 96. Repeat facility cleaning in a manner following the same pre-service procedures.⁴¹

³⁸ *Supra*, note 27.

³⁹ Office of Occupational Safety and Health Administration (OSHA), an agency of the United States Department of Labor. *See generally*, OSHA, “COVID-19,” available at: <https://www.osha.gov/SLTC/covid-19/> and https://www.osha.gov/SLTC/covid-19/additional_resources.html.

⁴⁰ OSHA continues to release updated memos addressing how to record workplace incidents of COVID-19 infection and how to record adverse reactions to the COVID-19 vaccine. *See*, OSHA, “COVID-19, FAQs” available at: <https://www.osha.gov/coronavirus/faqs#vaccine> (reversing OSHA’s position, as of May 24, to state that adverse reactions to vaccination, even where mandated as a condition of employment, are not OSHA recordable incidents); OSHA, “Updated Interim Enforcement Response Plan for Coronavirus Disease 2019 (COVID-19)” (Mar. 12, 2021), available at: <https://www.osha.gov/memos/2021-03-12/updated-interim-enforcement-response-plan-coronavirus-disease-2019-covid-19>; OSHA, “Revised Enforcement Guidance for Recording Cases of Coronavirus Disease 2019 (COVID-19)” (May 19, 2020), available at: <https://www.osha.gov/memos/2020-05-19/revised-enforcement-guidance-recording-cases-coronavirus-disease-2019-covid-19>; OSHA, “Updated Interim Enforcement Response Plan for Coronavirus Disease 2019 (COVID-19)” (May 19, 2020), available at: <https://www.osha.gov/memos/2020-05-19/updated-interim-enforcement-response-plan-coronavirus-disease-2019-covid-19>. *See also*, “Discretion in Enforcement when Considering an Employer’s Good Faith Efforts During the Coronavirus Disease 2019 (COVID-19) Pandemic” (Apr. 16, 2020), available at: <https://www.osha.gov/memos/2020-04-16/discretion-enforcement-when-considering-employers-good-faith-efforts-during>.

⁴¹ *Supra*, notes 19-21.



Z. ☐ Continue Alternative/Supplemental Measures and Community Outreach

97. Continue online services through streaming and social media to expand outreach to your community. PJI has an online tutorial for how to conduct a live-streaming broadcast available at www.pji.org.⁴²
98. Consider parking lot services or drive-in broadcasts following similar protocols.
99. Consider the relevant noise ordinances and FCC broadcasting requirements, Part 15, if undertaking a radio transmission service; alternative media through Zoom may also be possible.
100. Direct (non-physical) and continued communication and outreach is key.⁴³ Dialogue with both church leadership teams and parishioners; ensure community contact lists are up-to date and that ‘calling trees’—or other practices to account for individuals who may be living alone, elderly and/or vulnerable — are in place.

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⁴² PJI's online tutorial for live-streaming is available at: <https://www.pacificjustice.org/resources/for-churches/other-helpful-resources-2/how-to-live-stream-a-church-service-during-covid-19-mass-quarantines/>.

⁴³ See U.S. Dept. of Health and Human Services (HHS), Center for Faith and Opportunity Initiatives (The Partnership), ‘All in’ Against COVID-19” (Mar. 1, 2021), available at: <https://www.hhs.gov/sites/default/files/faq-and-guide-for-faith-and-community-leaders.pdf>; HHS & The Partnership, “Compassion in Action: A Guide for Faith Communities Serving People Experiencing Mental Illness and Their Caregivers” (July 2020), available at: <https://www.hhs.gov/sites/default/files/4-2-2020-mental-health-covid-final.pdf>; HHS & The Partnership, “Considering Faith, Community, and Mental Health During the COVID-19 Crisis” (Apr. 2, 2020), available at: <https://www.hhs.gov/sites/default/files/4-2-2020-mental-health-covid-final.pdf>; HHS & The Partnership, “COVID-19: Recommended Preventative Practices and FAQs for Faith-based and Community Leaders” (Mar. 17, 2020), available at: <https://www.hhs.gov/sites/default/files/3-17-20-faith-and-community-based-covid-19-faq.pdf>.



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