



TULE RIVER TRIBE PUBLIC HEALTH AUTHORITY

ORDER OF THE PUBLIC HEALTH AUTHORITY No. C19-09

SUBJECT: Requiring COVID-19 Safety Plans

I CURRENT SITUATION

COVID-19 is a highly contagious novel coronavirus spread mainly from person to person, through respiratory droplets produced when an infected person coughs, sneezes, or talks.¹ As of November 4, 2020, there have been 72 cases of COVID-19 identified through the Tule River Indian Health Clinic, Inc. but no deaths, 18,503 cases and 295 deaths in Tulare County, and 934,672 cases and 17,686 deaths in the State of California.²

While there have been no deaths in cases identified by the clinic so far, recovered patients sometimes suffer permanent heart, lung, or neurological damage from Covid-19. The Tule River Indian Reservation must take precautionary steps to protect its people, community, and elders from COVID-19.

II SUMMARY GUIDANCE

The following order is designed to protect the Tule River Indian Reservation, its residents, and its way of life. It begins at 12:00AM on November 5, 2020 and continues until otherwise noted.

All organizations operating in-person activities on the Tule River Indian Reservation or its properties must submit a COVID-19 safety plan to the Public Health Authority (PHA) for review and comment.

A COVID-19 safety plan must include the following information:

- **Entrance Screenings:** How people will enter your organization's buildings or events, including if the entrance can be monitored and if there will be any screenings for temperature or symptoms. A daily *sign-in sheet* is highly recommended to help with contact tracing if necessary.
- **Types of Activities:** List of activities that will be conducted by the organization, such as office work, athletic events. Note, there are certain activities, notably singing, chanting, shouting, and high physical exertion actions, that are considered by the California Department of Public Health (CDPH) as high-risk activities. Check the CDPH website for more info on high-risk activities as research develops.³
- **HR Policies:** Organizations should have a COVID leave and return to work policy. The leave policy should state when employees should be sent home or not allowed to come to work. Due to the infection risk of COVID-19, this policy may be different than typical sick leave policy. A return to

¹ <https://www.cdc.gov/coronavirus/2019-ncov/faq.html#Basics>

² <https://tchhsa.org/eng/index.cfm/public-health/covid-19-in-tulare-county/>

³ <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/CDPH-Guidance-for-the-Prevention-of-COVID-19-Transmission-for-Gatherings-10-09.aspx>

work policy is necessary for employees who are contacts of a positive case of COVID-19, show symptoms or test positive for COVID-19. The return to work policy should be based on the risk of infection of other staff, customers and the general public.

- **Size and Capacity:** The number of people who will be conducting in-person activities and the size of the indoor space they will be in. For example, the number of people in the office and floor space.
- **Cleaning Protocols:** There are three key features of cleaning protocols: what will be cleaned, with what material, and how often. Number of people touching surfaces, time between use, and ventilation may be considered for proper cleaning.
- **Response Plan:** The plans for what occurs if a positive case is identified within the staff. The plan may be to shut down activities until appropriate cleaning can occur, or to close only a portion of the organization.
- **Time Length:** The approximate amount of time that staff would spend together, both indoors and outdoors on a typical day.

Safety plans will be accepted in hard copy in the Emergency Operations Center (EOC) at the Tribal Administrative Building and by email at eoc@tulerivertribe-nsn.gov.

Submissions will be reviewed by the PHA and assigned a risk level of low, medium, and high. PHA recommendations will be sent to the organization to improve safety. All information will be passed along to the Tule River Indian Tribal Council for approvals as needed.

Rationale

A reopening plan is essential for all organizations on the Tule River Indian Reservation, or using Tule River Indian property, to protect the community and keep everyone as safe as possible. As Tulare County and the state of California reopen⁴, COVID-19 remains a threat to our community. While our current positive case rate and trend is holding steady, re-opening can cause a quick spike in cases. Plans are required to keep everyone as safe as possible through the reopening process.

Reviewing activities and policies of organizations is important because the Centers for Disease Control note that the risk of transmission of COVID-19 varies widely by activity.⁵ High-risk activities require extra precaution while less risky activities can be handled differently. It is the intention of the PHA to properly monitor activities by their risk.

Definitions

- a) **“Organization”** means any for profit or nonprofit entity which has employees or staff that are conduct activities
- b) **“In-person activities”** are any organizational actions that require individuals to be within 6ft of someone from a different household, whether indoors or outdoors.

⁴ <https://www.latimes.com/projects/california-coronavirus-cases-tracking-outbreak/reopening-across-counties/>

⁵ <https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>

III ENFORCEMENT

- 1) Violation of this order may result in civil fines set out in the Tribe's Communicable Disease Ordinance, or any other applicable tribal, state, or federal penalties.
- 1) Pursuant to Tribal Resolution No. FY2020-110, the Public Health Authority requests that Chief of Police of the Tule River Tribal Police enforce this Order to ensure compliance with its provisions. The violation of any provision of this Order may constitute an imminent threat and an immediate menace to public health.
- 2) This Order shall become effective on November 5, 2020 and will continue to be in effect unless extended, rescinded, superseded, or amended in writing by the Public Health Authority.
- 3) The Public Health Authority must promptly provide copies of this Order as follows: (1) by posting on the Tule River Indian Health Center Inc., website (www.trihci.org/covid-19) and all of the clinic's social media sites (2) by posting at the Tule River Tribal Council Administration Building and requesting that the Tribe distribute to all other tribal entities, departments, and organizations for immediate posting, and (3) by providing a copy to any member of the public requesting a copy. In addition, the owner, manager, or operator of any facility that is likely to be impacted by this Order is strongly encouraged to post a copy of this Order onsite and to provide a copy to any member of the public requesting a copy.
- 4) If any provision of this Order or its application to any person or circumstance is held to be invalid, then the remainder of the Order, including the application of such part or provision to other persons or circumstances, shall not be affected and shall continue in full force and effect. To this end, the provisions of this Order are severable.

Signature: 
Tribal Public Health Officer

Date: November 4, 2020

FAQS

1. What should my organizational policies be?

There are many resources to help organizations decide what their policies should be. Due to the

- General Resources
 - Centers for Disease Control
 - Guidance for Businesses (<https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>)
 - California Department of Public Health
 - Employer Playbook (<https://files.covid19.ca.gov/pdf/employer-playbook-for-safe-reopening--en.pdf>): Thorough planning document for businesses
 - Industry-specific Guidance (<https://covid19.ca.gov/industry-guidance/>): List of guidelines by industry. Note that the recommendations by industry vary by the tier status of each county.
 - Guidance for responding to COVID in the workplace (<https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Workplace-Outbreak-Employer-Guidance.aspx#>)
 - Occupational Safety and Health Administration (<https://www.osha.gov/Publications/OSHA3990.pdf>): Includes a 4-tier risk framework. Most organizations on the Tule River Indian Reservation would be in the Medium, or Low Risk categories.
- Cleaning Protocols
 - CDC (<https://www.cdc.gov/coronavirus/2019-ncov/community/reopen-guidance.html>): Includes a decision tree to help see what surfaces need to be cleaned and by what type of product