



Safety Rules
Policy No. 01
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City Manager: _____

CITY OF POMONA - SAFETY POLICIES AND PROCEDURES
INJURY ILLNESS PREVENTION PROGRAM (IIPP)

PURPOSE:

The City of Pomona is committed to providing a safe and healthy work environment for its employees. The purpose of this policy is to establish an ongoing and effective plan to reduce the incidence of injury and illness for employees of the City of Pomona, in accordance with the requirements of Labor Code §6401.7 and 8 CCR 3203.

Although this policy provides the essential guidelines for a plan that reduces injury and illness, it may be supplemented by department procedures outside this policy.

This policy does not supersede but supplements any related City safety effort.

APPLICABILITY:

This policy applies to all City employees.

POLICY:

The City of Pomona will adopt an Injury and Illness Prevention Program (IIPP) in order to increase the safety of its employees. Principles of progressive discipline will be followed as applicable to the employee's MOU for failure to comply with this program. Non-compliance may also result in citations and/or monetary fines from the California Occupational Safety and Health Administration (Cal-OSHA).

RESPONSIBILITIES

Department Directors shall be responsible for the overall implementation of the Injury and Illness Prevention Policy. The Department Director has the authority to delegate any or all portions of the IIPP to subordinates, but will be held responsible for the performance of the IIPP.

1. Department Directors are responsible for:

- a. The overall implementation of the Injury and Illness Prevention Policy;
- b. Supporting a positive safety culture;
- c. Appointing a supervisory staff member to be the Department Safety Representative (see number 3 for responsibilities);
- d. Hold safety meetings periodically with representatives from each division;

- e. Posting all health and safety information, such as safety posters and the Summary of Work-Related Injuries and Illnesses (Cal-OSHA Form 300A);
- f. Ensuring that each supervisor adheres to adopted policies and procedures and consistently enforces safety rules and regulations; and
- g. Coordinating discipline with the Department of Human Resources, for failure to implement and adhere to safe work practices.

2. Division Manager/Supervisor is responsible for:

- a. Effective implementation and maintenance of the division IIPP;
- b. Enforcing safety rules, policies and procedures;
- c. Providing employees with IIPP orientation and job-specific safety training prior to the assignment of employees to hazardous duties;
- d. Investigating accidents, injuries and near misses and preparing written documentation to determine the cause and to prevent future occurrence;
- e. Evaluating new equipment and procedures and making safety recommendations;
- f. Inspecting work areas routinely;
- g. Correcting unsafe conditions or initiating action to have it corrected;
- h. Conducting, coordinating, implementing and documenting the training programs designed to instruct employees in safe work practices and specific job duties;
- i. Hold informal safety meetings and document attendance at least every 10 working days to emphasize safety; and
- j. Actively participate in safety meetings.

3. Department Safety Representatives are appointed by the Department Director and are responsible for:

- a. Scheduling and documenting attendance of internal department safety meetings;
- b. Preparing written records of the issues discussed at safety meetings;
- c. Conducting periodic facility safety inspections and recommending appropriate measures for the elimination of unsafe conditions;
- d. Periodically updating the Department Director/Division Manager on safety activities with a copy to the Risk Management Division; and
- e. Meeting with Risk Management staff to review accident trends and identify preventative measures.

4. Employees are responsible for:

- a. Observing all City safety rules, policies and procedures;
- b. Reporting hazardous conditions and equipment failure to his or her supervisor;
- c. Using safety clothing and personal protective equipment (PPE) as required by position and task being performed;
- d. Performing their job duties in a manner that is safe for themselves as well as those around them;
- e. Attending all general and safety meetings and trainings;
- f. Reporting every injury, accident, and near miss incident to his or her supervisor; and

- g. Actively contributing to the success of the overall safety program by providing suggestions and ideas to help prevent accidents and injuries.

5. The Risk Manager and Safety Officer are responsible for the administration of the City's Safety Program. Their responsibilities include:

- a. Coordinating development and implementation of the City-wide IIPP with all departments and divisions;
- b. Assisting the Department Directors and Division Managers/Supervisors with the implementation of the IIPP;
- c. Maintaining records of employee accidents, injuries, and medical records;
- d. Assisting the Department/Division in correcting and tracking hazard reports and safety concerns through completion;
- e. Providing technical assistance on occupational health and safety issues to Department Directors and/or Division Managers/Supervisors;
- f. Provide to Department Directors and Division Managers/Supervisors all health and safety information, such as safety posters and Summary of Work-Related Injury and Illness (refer to Section 1, Item e);
- g. Investigating and reporting to Cal-OSHA serious injuries resulting in hospitalization or fatality and providing recommendations to prevent reoccurrence.

HAZARD CONTROL PROCEDURES

Identified hazardous conditions will be prioritized for correction through consideration of both the potential consequence (severity) and probability (frequency) of an injury or illness occurring. Corrective action for hazard elimination is the responsibility of the Department Director and Division Manager/Supervisor. Risk Management Division staff will provide or obtain expert assistance when necessary.

1. Safety Inspections

Facilities staff will conduct quarterly inspections of all City facilities. Facilities staff shall use the *City's Facility Safety Checklist* to document findings. The Facility Safety Checklist can be found on the intranet under Human Resources/Risk Management. All findings must have documented corrective actions with target dates for correction. The Division Manager/Supervisor of the area inspected is responsible for eliminating any hazards found during the inspection. A copy of the inspection will be kept on file with the Safety Officer and maintained for three (3) years. Departments engaged in hazardous operations are strongly encouraged to schedule monthly, weekly, or daily inspections depending on the operation.

Division Managers/Supervisors are responsible for the safety of the physical conditions in which their subordinates work. Each supervisor will make frequent work area inspections. Recommendations for the correction of unsafe conditions will be made through normal channels of authority and procedures.

2. Hazard Reports

City employees are encouraged to suggest or recommend measures which will eliminate unsafe practices or unsafe physical conditions. Employees are also required to report any hazardous conditions to his or her immediate supervisor. To document concerns, employees may use the *Hazard Reporting Form*, located on the intranet under Human Resources/Risk Management to submit a hard copy to the Human Resources/Risk Management Department. Employees may also e-mail the Risk Management Division directly at safety@pomonaca.gov.

Hazard Reports will be processed through regular lines of authority (e.g. chain of command). Those hazards that cannot be approved or disapproved at the department level will be referred to the Risk Management Division.

3. Imminent Hazards

Any condition or practice that may cause death or serious physical harm is considered an imminent hazard. Operations affected by serious hazards must be stopped immediately and reported to the Department Director and/or Division Manager/Supervisor. The Department Director/Division Manager/Supervisor will ensure that all employees are informed of imminent hazards and that all necessary precautions are taken to prevent injuries or illnesses.

INVESTIGATION OF ILLNESSES AND/OR INJURIES

All work-related injuries, illnesses, vehicle accidents, and injuries or property damage to members of the public on City property or involving City employees or equipment must be reported to the employees' supervisor immediately. In addition, all illnesses or injuries occurring in the workplace and resulting in serious injury, hospitalization or fatality of an employee must be reported immediately to the Risk Management Division.

1. Work-Incurred Illnesses and/or Injuries

a. Employees are responsible for:

- i. Reporting all work incurred injuries, illnesses and vehicle accidents, regardless of seriousness, to his or her immediate supervisor before the end of the work shift; and
- ii. Securing first aid for minor injuries immediately; and
- iii. Completing the *Employer's Report of Occupational Injury or Illness* form and *DWC-1* form. Forms are available on the intranet under Human Resources/Risk Management.

b. Supervisors are responsible for:

- i. Securing further medical treatment for employees, if required, from a City's Designated Medical Facility;
- ii. Providing Workers' Compensation Forms to injured employees within 24 hours of knowledge of Injury and/or Illness. Forms are available on the intranet under Human Resources/ Risk Management;
- iii. Completing the *Supervisor's Report of Injury or Illness* Form. Forms must be e-mailed to AdminSure at WorkersCompensationClaims@pomonaca.gov or sent to the Risk Management Division within 24 hours of the injury;

- iv. Emailing the employees completed *DWC-1* Form to AdminSure at WorkersCompensationClaims@pomonaca.gov or sent to the Risk Management Division within 24 hours of receipt from the injured worker;
- v. Reporting any serious illness and/or injury involving hospitalization, loss of consciousness, dismemberment, disfigurement or death to the Risk Management Division immediately by phone at 909-620-2291;
- vi. Immediately eliminating or controlling any obvious hazards that may have contributed to the incident;
- vii. Investigating the cause of work-related illnesses and injuries, as well as near misses; and
- viii. Completing the *Incident Investigation Form* within 48 hours of the incident and send to the Safety Officer for review.

c. Risk Management/Safety Officer staff is responsible for:

- i. Coordinating the provision of Workers' Compensation benefits as set forth by the California Workers' Compensation laws between the injured employee and the third party adjuster;
- ii. Collecting, printing, posting and forwarding to off-site location Supervisors for posting of the Summary of Work-Related Injuries and Illness form 300A;
- iii. Reporting any work-related injury or illness which requires inpatient hospitalization for a period in excess of 24 hours for other than medical observation or in which an employee suffers a loss of any member of the body or suffers any serious degree of permanent disfigurement. Reports shall be made to Cal OSHA by calling them and no longer than eight hours after the employer knows of a death or serious injury;
- iv. The Safety Officer will review every incident investigation form and return to the Division Manager, with comments, within 48 hours of receiving if any questions occur as to the findings of the investigation. When the investigation determines that the incident resulted from an unsafe act or violation of the City's Injury and Illness Prevention Policy, the employee may be subject to disciplinary action according to the appropriate Memorandum of Understanding or Agreement; and
- v. Working with supervisors to identify measures to prevent illnesses and injuries.

2. Motor Vehicle Collisions

It is the duty of the employee operating a vehicle on City business to immediately notify the Police Department and their Supervisor if involved in a collision, no matter how minor. Additionally, the employee is responsible for completing an *incident investigation report*; the report is available on the intranet under Human Resources/Risk Management. A copy of the completed report should be forwarded to Risk Management. When a City driver or equipment is involved in a collision in another jurisdiction, the driver will call the California Highway Patrol or the local law enforcement agency to make a collision report. When it becomes necessary for a disabled City vehicle to be towed away as a

result of a collision, the police officers investigating the collision will make the arrangements for the removal of the vehicle.

3. Accident Investigation

The purpose of the supervisor's investigation is to gather information to determine the cause(s) of accidents in order to prevent recurrences and future incidents.

The Department Director/Division Manager/Supervisor may require an additional investigation of accidents. In general, causes of accidents fall into four general categories: unsafe physical acts by people, unsafe physical conditions, unsafe equipment or use of equipment, and acts of nature.

The Risk Management Division may conduct an additional investigation of any accident involving City employees or property when additional information is deemed necessary to determine cause. Accident investigation reports are confidential.

4. Reports

Summary of Work-Related Injuries and Illnesses form 300A are available for review in the Risk Management Division located at City Hall 505 S. Garey Ave. Pomona, CA 91769. Annual summaries of the Summary of Work-Related Injuries and Illnesses form 300A will be distributed to each department for posting in a common area wherever notices to employees are usually posted as required by law starting February through April of each year.

EMPLOYEE SAFETY TRAINING

The objective of safety training is to develop skills and knowledge to decrease the frequency and severity of illnesses and injuries and to develop employee appreciation for safety and accident prevention. All City employees will be trained by his or her supervisor in safe work practices applicable to the performance of his or her work prior to assignment. Safety topics and refresher training will be provided as required to maintain regulatory compliance.

Each supervisor receives safety training appropriate to the responsibilities of the supervisory position held. Such training will include the basic techniques of accident prevention, accident investigation and safety training. If assigned, Department Safety Representatives will receive training in the responsibilities and techniques of their assignments. All training will be documented, forwarded to and maintained by the Safety Officer per the Records Retention Policy. The documentation shall include the employee's name, training date, type of training, training aids or handouts used, the name of the trainer, and signed by the employee. Training will be conducted in a manner that is readily understandable by all affected employees.

EMPLOYEE COMMUNICATION

The following methods have been established to communicate with employees on matters relating to health and safety.

1. Departments will schedule safety meetings at least quarterly. Records will be maintained for a period of at least five (5) years and will contain the dates of the meeting, agendas, attendance rosters and summary minutes of the safety issues discussed.
2. Managers and supervisors will encourage employees to report any unsafe or unhealthy conditions that employees discover without fear of reprisal. Employees may also communicate hazards in face-to-face conversations, via telephone, through interoffice mail, by completing a Hazard Reporting Form, or via email to safety@pomonaca.gov, his/her manager, Department Safety Representative, or the Risk Management Division. Completed forms are kept on file for a period of five (5) years by the Safety Officer.
3. Employees will be informed of safety rules and Cal-OSHA regulations through the Managers, Supervisors and/or Risk Management Division.
4. City-wide safety policies and programs are available on the City's intranet site. Department specific safety policies and procedures are available from their respective department.

SAFETY RULES AND REGULATIONS

Department Directors may develop specific safety rules. Such rules are subject to review by the Risk Management Division. Upon approval, department-specific safety rules will be published for distribution to all affected employees.

Safety is an integral part of each employee's job.

RECORD KEEPING

Departments will maintain records of facility inspections for at least three (3) years and hazard reports for at least five (5) years. Records must include the names of those who conducted the inspection, the dates of the inspection, the hazards that were identified and any corrective action that was taken.

Departments will maintain training records per the City's records retention schedule. Training records must include the names of the employees trained, the topics covered in the training, the date of the training, the trainer's identity and signatures of employees who attended. Forms for documentation of training and inspections are available at the Risk Management Division or intranet under HR/Risk Management. Electronic training records are also acceptable.

Departments will maintain Safety Data Sheets (SDS) for chemicals for 30 years unless an inventory, including the identity of the substance, where it was used and when it was used is retained for at least 30 years. The Hazard Communication Program specifies procedures for maintenance of SDS and chemical inventories.

Employee records from medical monitoring and exposure evaluations will be preserved and maintained for the duration of employment plus thirty years. Employees and his or her designated representative have a right to access their personal medical and exposure records.

COVID-19 PROCEDURES

Addendum to City of Pomona's Injury and Illness Prevention Program

COVID-19 is a workplace hazard and therefore is addressed under this Injury Illness Prevention Program (IIPP). "COVID-19" means the disease caused by SARS-CoV-2 (severe acute respiratory syndrome coronavirus 2).

Evaluation of COVID-19 Hazards

An employee is potentially exposed to COVID-19 hazards when near other persons, whether or not the employee is performing an assigned work task. The City will treat all persons as potentially infectious, regardless of symptoms, vaccination status, or negative COVID-19 test results. COVID-19 will be considered a hazard specific to an employee's job assignments and job duties if those assignments and/or duties bring the employee near other persons.

When determining measures to prevent COVID-19 transmission and to identify and correct COVID-19 hazards, the City will continue to review applicable orders and guidance related to COVID-19 from the State of California and the local health department with jurisdiction over the workplace and will treat COVID-19 as an airborne infectious disease. COVID-19 prevention controls include remote work, physical distancing, reducing the density of people indoors, moving indoor tasks outdoors, implementing separate shifts and/or break times, restricting access to the work area, and other prevention measures, in addition to the requirements applicable law and regulation.

Investigation of COVID-19 Cases and Illnesses

The City of Pomona's procedures to investigate COVID-19 illness at the workplace include the following:

- The City will determine the day and time a COVID-19 case was last present and, to the extent possible, the date of the positive COVID-19 test(s) and/or diagnosis, and the date the COVID-19 case first had one or more COVID-19 symptoms, if any were experienced.
- The City will effectively identify and respond to persons with COVID-19 symptoms at the workplace. **Employees are encouraged to report COVID-19 symptoms and to stay home when ill.**

Responding to COVID-19 Cases in the Workplace

The City has developed effective methods and/or procedures for responding to a COVID-19 case at the workplace in accordance with applicable law, including the following procedures.

The City will immediately exclude from the workplace all COVID-19 cases and employees excluded under outbreak and major outbreak scenarios.

If an order to isolate, quarantine, or exclude an employee is issued by a local or state health official, the employee may not return to work until the period of isolation or quarantine is completed or the order is lifted.

Upon excluding an employee from the workplace based on COVID-19 or a close contact, the City will give the employee information regarding COVID-19 related benefits to which the employee may be entitled under applicable federal, state, or local laws. This includes any benefits available under legally mandated sick leave, if applicable, workers' compensation law, local governmental requirements, the City's own leave policies, and leave guaranteed by contract.

COVID-19 Positive Cases

COVID-19 positive cases who do not develop COVID-19 symptoms may not return to work during the infectious period.

COVID-19 positive cases who develop COVID-19 symptoms may not return to work during the shorter of the following:

- Isolation can end after Day 5 ONLY if all of the following criteria are met:
 - You have a negative COVID-19 test** that was collected on Day 5 or later, and
 - You have not had a fever for at least 24 hours without the use of fever-reducing medicine, and
 - Your symptoms are improving.
- OR-
- Isolation can end after Day 10 if you have not had a fever for at least 24 hours without the use of fever reducing medicine.

If you do have a fever, continue isolation until 24 hours after your fever resolves

Regardless of vaccination status, previous infection, or lack of COVID-19 symptoms, a COVID-19 case must wear a face covering in the workplace until 10 days have passed since the date that COVID-19 symptoms began or, if the person did not have COVID-19 symptoms, from the date of their first positive COVID-19 test.

These requirements apply regardless of whether an employee has previously been excluded or other precautions were taken in response to an employee's close contact or membership in an exposed group.

COVID-19 Close Contacts

The City will follow current CDPH and Cal/OSHA guidance regarding persons who have had close contacts, including any guidance regarding other measures to reduce transmission. The City will also follow the current CDPH and Cal/OSHA guidance regarding exclusion and return to work of employees who have had close contacts.

The City will make COVID-19 tests available at no cost during paid time, to all employees who had a close contact in the workplace, and will provide them with a description of the benefits described above.

Notice of COVID-19 Cases

The City will provide required notices of COVID-19 cases and close contacts in accordance with the requirements of Cal/OSHA regulations, Labor Code section 6409.6 and/or any other applicable law.

Face Coverings

The City will provide face coverings and ensure they are worn by employees when required by a CDPH regulation or order, or by an order of a local public health department. When a CDPH regulation or order requires face coverings indoors, that includes spaces within vehicles. Face coverings must be clean, undamaged, and worn over the nose and mouth.

When employees are required to wear face coverings the following exceptions apply:

- When an employee is alone in a room or vehicle.
- While eating or drinking at the workplace, provided employees are at least six feet apart and, if indoors, the supply of outside or filtered air has been maximized to the extent feasible.
- While employees are wearing respirators required by the employer and used in compliance with existing law.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Such employees must wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if the condition or disability permits it.
- During specific tasks which cannot feasibly be performed with a face covering. This exception is limited to the time period in which such tasks are actually being performed.

If an employee is not wearing a face covering pursuant to the last two exceptions above, the City will assess COVID-19 hazards and take action as necessary.

The City will not prevent any employee from wearing a face covering, including a respirator, when not required by law, unless it would create a safety hazard.

Upon request, the City will provide respirators for voluntary use to all employees who are working indoors or in vehicles with more than one person. When providing a respirator for voluntary use, the City encourages their use and will ensure that employees are provided with a respirator of the correct size and that employees are trained how to properly wear the respirator provided; how to perform a user seal check according to the manufacturer's instructions each time a respirator is worn; and the fact that facial hair interferes with a seal.

Ventilation

For indoor work locations, the City has reviewed CDPH and Cal/OSHA guidance regarding ventilation, including “Interim Guidance for Ventilation, Filtration, and Air Quality in Indoor Environments.”

The City has developed, implemented, and maintained effective methods to prevent transmission of COVID-19 including one or more of the following actions to improve ventilation:

- Maximize the supply of outside air to the extent feasible, except when the United States Environmental Protection Agency (EPA) Air Quality Index is greater than 100 for any pollutant or if opening windows or maximizing outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.
- In buildings and structures with mechanical ventilation, filter circulated air through filters at least as protective as Minimum Efficiency Reporting Value (MERV)-13, or the highest level of filtration efficiency compatible with the existing mechanical ventilation system.
- Use High Efficiency Particulate Air (HEPA) filtration units in accordance with manufacturers’ recommendations in indoor areas occupied by employees for extended periods, where ventilation is inadequate to reduce the risk of COVID-19 transmission.

In vehicles, the City will ensure employees maximize the supply of outside air to the extent feasible, except when doing so would cause a hazard to employees or expose them to inclement weather.

Reporting and Recordkeeping

The City will record and track all COVID-19 cases with the employee's name, contact information, occupation, location where the employee worked, the date of the last day at the workplace, and the date of the positive COVID-19 test and/or COVID-19 diagnosis.

The City will also keep records of notices required to be provided accordance with the requirements of Cal/OSHA regulations, Labor Code section 6409.6 and/or any other applicable law.

Personal identifying information of COVID-19 cases or persons with COVID-19 symptoms, and any employee medical records will be kept confidential unless disclosure is required or permitted by law. Unredacted information on COVID-19 cases will be provided to the local health department with jurisdiction over the workplace, CDPH, the Division, and NIOSH immediately upon request, and when required by law.

COVID-19 Outbreaks and Major Outbreaks

The following procedures apply if three or more employee COVID-19 cases within an exposed group visited the worksite during their infectious period at any time during a 14-day period (unless a CDPH regulation or order defines outbreak differently) and will apply until there are one or fewer new COVID-19 cases detected in the exposed group for a 14-day period:

- The City will immediately make COVID-19 testing available at no cost to employees within the exposed group, regardless of vaccination status, during employees' paid time, except for returned cases and employees who were not present at the workplace during the relevant 14-day period(s).
- The City will then make testing available on a weekly basis to all employees in the exposed group who remain at the workplace.
- Employees who had close contacts must have a negative COVID-19 test taken within three to five days after the close contact or must be excluded and follow the applicable return to work requirements starting from the date of the last known close contact.
- Employees in the exposed group, regardless of vaccination status, must wear face coverings when indoors, or when outdoors and less than six feet from another person, unless an exception applies.
- The City will notify employees of their right to request and receive a respirator for voluntary use.
- The City will immediately perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19, and periodically thereafter. The investigation, review, and changes will be documented and will include:
 - Investigation of new or unabated COVID-19 hazards including the City's leave policies and practices and whether employees are discouraged from remaining home when sick; the City's COVID-19 testing policies; insufficient supply of outdoor air to indoor workplaces; insufficient air filtration; and insufficient physical distancing.
 - The review will be updated every 30 days in response to new information or to new or previously unrecognized COVID-19 hazards, or when otherwise necessary.
 - Any changes implemented to reduce the transmission of COVID-19 based on the investigation and review, which may include: moving indoor tasks outdoors or having them performed remotely; increasing the outdoor air supply when work is done indoors; improving air filtration; increasing physical distancing to the extent feasible; requiring respiratory; and other applicable controls.
- In buildings or structures with mechanical ventilation, the City will filter recirculated air with Minimum Efficiency Reporting Value (MERV)-13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible

with the ventilation system, the City will use filters with the highest compatible filtering efficiency. The City will use High Efficiency Particulate Air (HEPA) air filtration units in accordance with manufacturers' recommendations in indoor areas occupied by employees for extended periods, where ventilation is inadequate to reduce the risk of COVID-19 transmission.

The following procedures apply if 20 or more employee COVID-19 cases in an exposed group visited the worksite during their infectious period within a 30-day period and will apply until there are one or fewer new COVID-19 cases detected in the exposed group for a 14-day period:

- COVID-19 testing will be required of all employees in the exposed group, regardless of vaccination status, twice a week or more frequently if recommended by the local health department with jurisdiction over the workplace. Employees in the exposed group must be tested or will be excluded and must follow applicable return to work requirements.
- The City will report the outbreak to Cal/OSHA.
- The City will provide respirators for voluntary use to employees in the exposed group, will encourage their use, and will train employees provided respirators for voluntary use.
- Any employees in the exposed group who are not wearing respirators will be separated from other persons by at least six feet, except where six feet of separation is not feasible, and except for momentary exposure while persons are in movement. Methods of physical distancing include: telework or other remote work arrangements; reducing the number of persons in an area at one time, including visitors; visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel; staggered arrival, departure, work, and break times; and adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees. When it is not feasible to maintain a distance of at least six feet, individuals must be as far apart as feasible.