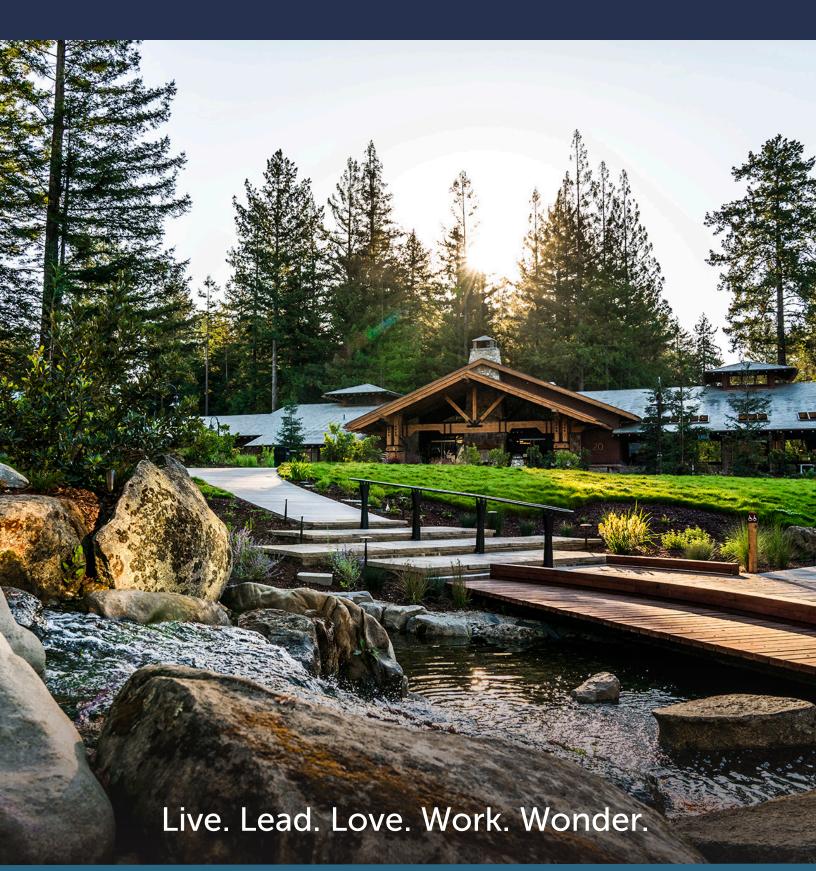


# Campus Health & Safety Plan



#### Dear friends,

When we co-created 1440 Multiversity, we envisioned our nonprofit learning destination as a safe place to allow creativity to flourish and energy to renew; a catalyst for individuals to be self-aware and discover their own unique path for growth. Creating hope for living well is the core of our mission, and we continue to embrace that mission fully as we answer the call for help in a bigger way – help that was critically needed before the COVID-19 pandemic changed our lives.

Humanity is experiencing a time right now that is uncertain, concerning, and challenging beyond measure. People



around the world are especially vulnerable and need support. As new compassionate connections grow out of this crisis, a renewed love and respect for one another has begun unveiling itself globally. We owe a debt of gratitude to you for your ongoing support over the last four years and are hopeful that your return to 1440 Multiversity will be met with the energy, discovery and creativity you seek to heal from this unimaginable situation that has undoubtedly impacted your life and the lives of so many others you know and love.

Throughout the pandemic we could not be more proud of our 1440 family members. This team embodied our organizational culture by showing up to prepare and serve more than 80,000 meals to individuals housed in over 25 county shelters and earning an Essential Business designation by the County of Santa Cruz, Office of Emergency Services for the work they accomplished, which included caring for fire evacuees this past summer and fall through the Healing Our Community program we created.

The intentional decision to proactively suspend public campus programming in 2020 and resume programming in the second quarter of 2021 afforded the organization time to focus exclusively on community building and protect the health and wellbeing of our faculty, guests and clients. It felt like the right decision at the time, and we are more certain than ever that it has energized our entire organization by allowing us to refine our approach to the global community and have a lasting impact on our vision of creating hope for living well.

We thank you for your unwavering loyalty during this past year and look forward to co-creating experiences that matter as we all begin to safely gather again with positive intention and purpose. Please let this plan be a proactive reminder of our commitment to your overall health, safety and — of course — ultimately to living well.

With gratitude,

Foanie & Scott Kriens

Joanie and Scott Kriens Co-creators, 1440 Multiversity

#### Overview

On March 19, 2020, the California State Public Health Officer and Director of the California Department of Public Health issued an initial order requiring most Californians to stay at home to disrupt the spread of COVID-19 among the population. Since that time more than a year ago, the COVID-19 pandemic continues to impact the health of Californians. Reported illness ranges from very mild (some people have no symptoms) to severe. Certain groups, including those with serious underlying medical conditions such as heart or lung disease or diabetes, are at higher risk of hospitalization and serious complications. In addition, the risk of more severe disease and death increases with age.

As the pandemic has unfolded, we have learned that many organs can be affected by COVID-19 and there are numerous ways the infection can impact someone's health. While most individuals with COVID-19 recover and return to their baseline level of health, some people can have symptoms that last for weeks or even months after recovery from acute illness. Even people who are not hospitalized and who have mild illness can experience persistent or late symptoms.

Transmission is most likely when people are in close contact or in a poorly ventilated area with an infected person. Transmission can occur when the infected person has symptoms or has not yet developed symptoms. Virus particles can travel more than 6 feet in indoor spaces and remain suspended in air even after an infected person has left the room. Indoor settings pose a much higher risk of transmission than outdoor settings. When an infected person does certain activities such as singing or chanting, loud talking, or heavy breathing during exercise it can further increase risk compared to normal breathing and talking.

Therefore, it is essential that all possible steps be taken to ensure the safety of workers and the public by implementing the following key practices:

- Physical distancing to the maximum extent possible,
- Use of face coverings by workers (where respiratory protection is not already required) and customers/clients,
- For indoor locations, ensuring adequate ventilation in all spaces,
- Frequent hand washing and regular cleaning and disinfection, and
- Training workers on these and other elements of the COVID-19 prevention program.

On January 5, 2022, the California Division of Occupational Safety and Health (Cal/OSHA) readopted mandatory emergency temporary standards (ETS) to prevent worker exposures to COVID-19 in most workplaces where workers are not covered by Cal/OSHA's Aerosol Transmissible Diseases standard. Under the ETS, employers have obligations including to develop and implement policies and procedures to prevent disease transmission in the workplace; to identify new disease cases if they occur; and, when they are identified, to intervene quickly and work with public health authorities to halt the spread of the virus. The ETS covers topics that are also addressed by this guidance. The guidance has been updated to clarify any instances where public health guidance imposes additional requirements beyond those mandated by the ETS and to highlight additional recommended practices for public health purposes beyond those mandated by the ETS.

1440 Multiversity expects all staff members and guests to agree to participate in and cooperate with all health, safety and emergency protocols as outlined in this plan. In addition, please note that local health officers may implement more stringent rules tailored to local epidemiological conditions that may be required without advance notice that require mandatory compliance.

#### Purpose

This document provides guidance for 1440 Multiversity to support a safe, clean environment for workers and customers. The guidance is not intended to revoke or repeal any statutory or regulatory rights, is not exhaustive as it does not include county health orders, nor is it a substitute for any existing safety- and health-related regulatory requirements such as those of Cal/OSHA. 1440 observes Cal/OSHA safety and health guidance in addition to CDC recommendations for additional guidance provided to businesses and employers.

The COVID-19 vaccines remain effective in preventing serious disease, hospitalization, and death from the SARS-CoV-2 virus. Unvaccinated persons are more likely to get infected and spread the virus which is transmitted through the air and concentrates indoors. Therefore, the California Department of Public Health (CDPH) is requiring masks to be worn in all indoor public settings, irrespective of vaccine status, until February 15, 2022. This requirement will be updated as CDPH continues to assess conditions on an ongoing basis.

This measure brings an added layer of mitigation as the Omicron variant, a *Variant of Concern* as labeled by the World Health Organization (WHO), continues to increase in prevalence across California, the United States, and the world and spreads much more easily than the original SARS-CoV-2 virus and the Delta variant.

Over the last two weeks, the statewide seven-day average case rate has increased by more than sixfold and hospitalizations have doubled. While the percentage of Californians fully vaccinated and boosted continues to increase, we continue to have areas of the state where vaccine coverage is low, putting individuals and communities at greater risk for COVID-19. Given the current hospital census, which is over capacity, the surge in cases and hospitalizations has materially impacted California's healthcare delivery system within many regions of the state. Staffing levels are also increasingly impacted by COVID-19 transmission in many critical sectors.

Please note that local health departments can have more restrictive criteria and different closures. Across all tier levels, 1440 Multiversity has instituted the following best practices for the use of all private event and classroom spaces:

- Attendance at any private event on the 1440 Multiversity campus is limited to preregistered guests only.
- Adherence to the current masking guidelines as determined by Federal, State and Local Health officials.
- Guests who do not comply may be asked to leave the campus immediately unless they qualify for a CDPH Face Covering Exemption.
- All food and drink must be served by 1440 staff to guests while maintaining physical distancing and face covering guidelines.
- Guests who are not fully vaccinated must maintain a physical distance of 6 feet between people between others and wear an approved face covering at all times.
- Masks are required for all individuals in all indoor public settings, regardless of vaccination status, through February 15, 2022 (surgical masks, or higher-level respirators, N95s, KN95, KF94s with good fit are recommended).
- All outside vendors must be approved in advance by 1440 Multiversity and once approved comply with all health and safety policies and practices at all times. Photographers should use lenses that allow for physical distancing.
- 1440 Multiversity expects all private event attendees to comply with CDPH Travel Advisory guidelines.

For additional information on types of masks, the most effective masks, and ensuring a well-fitted mask, individuals should refer to *CDPH Get the Most out of Masking* and see *CDPH Masking Guidance Frequently Asked Questions* for more information. View the link here:

https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Get-the-Most-out-of-Masking.aspx



#### Campus Safety & Emergency Response

- This written plan is a worksite-specific COVID-19 prevention plan based on a comprehensive risk assessment of all work areas with facility oversight by the Senior Director of Operations.
- Contact information of local health department officials has been identified should there be a need to communicate information about COVID-19 outbreaks among employees and/or other visitors to campus.
- This prevention plan has been communicated to all employees who have been trained on required guidelines and protocol. Private events may mandate additional requirements.
- Safety team is empowered to investigate any COVID-19 illness and determine if any work-related factors could have contributed to risk of infection and amend any plan elements necessary to mitigate the risk of further cases.
- Daily inspections of the workplace are completed to ensure compliance with the plan and document and/or correct deficiencies identified.
- Contact tracing will be used on any reported case to identify close contacts (within 6 feet for 15 minutes or more) of an infected person and isolate anyone suspected of being COVID-19 positive.
- Adherence to plan guidelines is expected as outlined herein to prevent any possible campus illness. An outbreak may result in campus operations being ceased or limited without notice.
- Room recovery protocol: In the case of a presumptive COVID-19 positive guest, the guest's room is removed from service and quarantined, and only returned to service after undergoing enhanced sanitization protocol (per county regulations). 1440 disinfection protocols include the use of electrostatic sprayers and FDA-approved disinfectants proven effective against COVID-19. If deemed necessary, 1440 will contract with a licensed third-party for room sanitization.
- Fresh air exchange is optimized by scheduled air filter replacement and HVAC system cleaning.
- Campus signs and markers reinforce etiquette standards and policies all guests must follow to mitigate the spread of germs and viruses (via coughing, sneezing and unclean hands):
  - ✓ Do not touch your face after making contact with potentially contaminated objects and surfaces.
  - $\checkmark$  Your hands are a means of contamination -- wash and sanitize them regularly.
  - $\checkmark$  Cover your mouth and nose with a tissue when you cough or sneeze.
  - $\checkmark$  If you don't have a tissue, cough or sneeze into your upper sleeve, not your hands.
  - ✓ Put your used tissue in a waste basket.
  - ✓ Maintain a safe social distance of 6 feet or more if you are not vaccinated or fully vaccinated.
  - ✓ If you are fully vaccinated, you may be able to resume certain activities in compliance with prevailing guidelines on masking and social distancing.
- Cooperate with authorities on investigating suspected/confirmed COVID-19 cases suspected on campus to include, but not limited to, contact tracing.
  - $\checkmark$  Any guest who tests positive for COVID-19 will be required to leave campus immediately.
  - ✓ 1440 may restrict areas visited by the ill person(s) to properly clean and disinfect to the highest standards and protocols and minimize any potential risk of infection in such areas.
  - ✓ Open outside doors and windows and use ventilating fans to increase air circulation in the area.
  - $\checkmark$  Wait 24 hours or as long as practical before beginning cleaning and disinfection.
  - $\checkmark$  Disinfect all areas with special focus on frequently touched surfaces used by any ill or infected persons.
  - $\checkmark\,$  Revisit process for cleaning and disinfecting.

# 1440 Multiversity Staff Expectations

- Participate in training on COVID-19, how to prevent it from spreading, and knowledge of the underlying health conditions that may make individuals more susceptible to contracting the virus.
- Employees are expected to self-screen at home and may be subject to additional workplace screening, including temperature and/or symptom checks, using CDC guidelines.
- 1440 provides complimentary KN95 face coverings to all staff members. Fully vaccinated employees may be able to avoid certain requirements, however in all cases are required to follow prevailing federal, state and local mandates pertaining to face coverings and social distancing.
- Employees are advised to stay home, quarantine and seek medical attention if they begin experiencing any symptoms related to COVID-19 1440 may pay employees who follow testing protocol.
- Staff members are educated on the importance of frequent hand washing with soap and water, including scrubbing with soap for 20 seconds (or using hand sanitizer with at least 60% ethanol or 70% isopropanol when they do not have immediate access to a sink or hand washing station, per CDC guidelines.
- 1440 conducts periodic inspections as needed to identify possible unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with established campus, local, state and federal health and safety guidelines.
- Maintain physical distancing, both at work and off work, in keeping with the Physical Social Distancing section of the plan outlined below.
- Proper use of face coverings applies to all individuals, including understanding that:
  - $\checkmark$  Face coverings do not protect the wearer and are not personal protective equipment (PPE).
  - ✓ Face coverings can help protect people near the wearer, but do not replace the need for physical distancing and frequent hand washing.
  - ✓ Face coverings must cover the nose and mouth.
  - ✓ Employees should wash or sanitize hands before and after using or adjusting face coverings.
  - ✓ Everyone should avoid touching eyes, nose and mouth.
- Face coverings should be replaced after each shift.
- All non-vaccinated or fully vaccinated staff members are required to follow prevailing mask guidelines, which may include wearing a mask indoors and maintaining a safe social distance of at least 6 feet and limit any close contact within 6 feet to a cumulative total of 15 minutes of less with each guest when outdoors.
- If allowed under prevailing federal, state and local guidelines, vaccinated employees may remove their masks outdoors when appropriately maintaining a social distance of 6 feet or more.
- All contract workers and vendors on campus must adhere to plan guidelines for COVID-19 prevention and have necessary PPE. 1440 discusses these responsibilities with all suppliers.
- 1440 supports all government-sponsored leave benefit programs our employees may be entitled to receive that would make it financially easier to stay at home in addition to government programs supporting sick leave and workers' compensation for COVID-19, including employee's sick leave rights under the Families First Coronavirus Response Act and employee's rights to workers' compensation benefits and presumption of the work-relatedness of COVID-19 pursuant to the Governor's Executive Order N-62-20.

#### Face Coverings & Control Measures

- 1440 follows Cal/OSHA ETS requirements in identifying individual control measures through the implementation of this COVID-19 Prevention Program.
- 1440 has the right to conduct temperature and/or symptom screenings on staff, guests, vendors, contractors or others entering indoor or other public areas at its sole discretion, utilizing non-contact thermometers to read temperatures.
- Employees and guests may be asked to wait momentarily and/or distance themselves in certain areas to ensure that those performing temperature/symptom screening can avoid and/or minimize close contact with others to the greatest extent possible. Everyone is required wear face coverings during screening procedures.
- All employees and guests are advised to stay home if they are sick or exhibit any symptoms of COVID-19. 1440 Multiversity reserves the right to deny campus access to anyone who appears to pose a risk to public health at our sole discretion.
- Guests may use their own personal protective equipment; however, 1440 will provide all required PPE to employees and face coverings to guests who need them (fees may apply).
- Masking guidelines and orders from public health officials continue to evolve as we learn more about how the COVID-19 virus and variants are spread. For the protection of our guests and staff, and to ensure campus compliance, 1440 monitors and enforces the prevailing masking and social distancing mandates and guidelines as set forth by Federal, State and Local health officials.
- Employees are instructed to run ventilation systems and/or open windows to increase air circulation when possible.
- 1440 encourages employees to wash their hands or use sanitizer when possible after all guest interactions, after cleaning assigned areas, after opening mail or handling other commonly touched items. Guest deliveries are encouraged during times when guests are not in their rooms.
- 1440 schedules extra time for staff to thoroughly clean and adhere to required precautions including the disinfection of guest traffic areas.
- All staff who handle items contaminated by body fluids should always wear protective disposable gloves, aprons and change them frequently.
- Stewards should use protective glasses, googles or face shield to protect the eyes, nose, and mouth from exposure to contaminant splash reusable protective equipment, such as shields and glasses, should be properly disinfected between uses.



# Facility Cleanliness & Disinfecting Protocols

- Staff performs thorough cleaning in high-traffic areas such as lobbies, counters, dining areas, break rooms, loading docks, kitchens, classrooms, doorwalls, and areas of ingress and egress including stairways, stairwells, handrails, and elevator controls.
- Frequently disinfect commonly used surfaces including but not limited to door handles, light switches, temperature controls, hairdryers, toilets, washer/dryer doors, shuttle seats, and hand-washing facilities.
- 1440 cleaning protocols include the use of electrostatic sprayers with FDA approved cleaners proven effective against COVID-19. 1440 has placed touchless hand sanitizer dispensers throughout the campus using a 70% ethyl alcohol gel with aloe.
- 1440 designates and provides time for workers to implement cleaning practices during their shift. Cleaning duties are assigned during working hours as part of the employee's job and departmental duties.
- Public spaces throughout campus, employee workstations desks, and help counters are equipped with proper sanitation products to include hand sanitizer and/or sanitizing wipes.
- Daily inspections are conducted to ensure sanitary facilities stay operational and stocked with necessary PPE at all times dispensers for soap, paper towels, and hand sanitizer are replenished as needed.
- Products used for cleaning are approved for use against COVID-19 on the Environmental Protection Agency (EPA)-approved list and responsibly used according to product instructions.
- 1440 uses disinfectants labeled to be effective against emerging viral pathogens, diluted household bleach solutions (5 tablespoons per gallon of water), or alcohol solutions with at least 70% alcohol that are appropriate for the surface.
- Employees have been trained on the manufacturer's directions and Cal/OSHA requirements for safe use, including proper PPE required by product instructions.
- No shared use of PPE is acceptable in this plan.
- 1440 discourages the shared use of equipment. When necessary, all shared tools and equipment are required to be sanitized before, during, and after each shift or anytime the equipment is transferred to a new employee. This includes phones; radios; computers and other communication devices; payment terminals; kitchen implements; engineering tools; safety buttons; folios; housekeeping carts and cleaning equipment; keys; time clocks; and all other direct-contact items.
- Each guest room has independent air circulation and filtration. Meeting rooms with central HVAC systems utilize MERV-13 rated filtration.
- 1440 is beta testing indoor air quality technology in areas where people gather.
- We encourage the opening of all guestroom windows to allow for the circulation of fresh outside air, and ventilation in rooms, offices, classrooms and other spaces.
- 1440 continues to monitor and implement the latest best policies, practices and mandates as issued by the CDC, California Department of Public Health and County of Santa Cruz Health Services Agency.



### Social & Physical Distancing Guidelines

- 1440 implements measures to favor physical distancing of at least 6 feet between non-vaccinated or non fully vaccinated employees and others while on campus which may include a combination of physical partitions, pre-determined spacing, and/or visual cues (e.g., floor markings and signs indicate to where employees and/ or guests should stand) for appropriate physical distancing.
- Physical distancing protocols are also enforced internally in employee-only work areas such as employee break spaces, training classrooms, shared office spaces, and other high-density areas in order to ensure appropriate distancing between employees. Employee breaks are also spaced in compliance with wage and hour regulations, to maintain physical distancing protocols.
- All staff pre-shift meetings are to be conducted virtually or in areas that allow for appropriate physical distancing between employees, utilizing outdoor openair spaces when possible. Employee schedules are also staggered to minimize interaction as much as possible.
- 1440 has proactively modified the work duties of some employees and arranged for remote or telework where possible to mitigate their exposure to those required to be on campus.
- Employees are discouraged from meeting in conference rooms and congregating during breaks. Outdoor break areas with shade covers and seating are available at the Lodge Building for employees to ensure physical distancing away from guests and one another.
- Please place your hand over your heart, nod, or make a friendly gesture when greeting others on campus if you are not comfortable with handshakes and similar greetings.
- Employees and guests will notice that certain amenities and reusable collateral have been removed from circulation to mitigate the risk of person-to-person contact. Critical information will be communicated electronically via the campus texting tool which you may access via your personal device once registered on campus.
- Use your own supplies and avoid touching others' pens, cups, clipboards, binders, and other personal belongings if you are not vaccinated or fully vaccinated.

# On-Campus Communication

- The primary means of communication while on campus is the use of Zingle a two-way messaging and "contactless" communication tool between 1440 staff and registered guests.
- Zingle can and should be used for all of the following communication:
  - $\checkmark$  All guest service and maintenance requests.
  - $\checkmark$  Questions for staff during your stay.
  - $\checkmark$  Requests for room deliveries.
  - ✓ Mobile café orders from the Lodge Café and Common Grounds Café.
  - $\checkmark\,$  Updates on Signature Class times, locations and changes.
  - ✓ Event and seminar updates.
  - $\checkmark\,$  Service hours and facility updates.
  - ✓ Express checkout.
- All registered guests who provide a valid email address will receive a pre-arrival message indicating on-campus etiquette and guidelines.
- All common area phones have been removed from the campus to reduce shared touch points.
- 1440 expanded its online learning offerings content can be accessed at 1440.tv.



## Campus Arrival & Departure Protocol

- Please do not unload your luggage when exiting your vehicle, and proceed to the registration area (without your personal belongings).
- Please have your picture identification available and ready to present for each member of your traveling party in addition to a valid credit card.
- 1440 has limited dedicated private self-parking spaces near all guest buildings on a first-come basis for all program participants. We ask our guests to handle their own bags upon arrival and departure, and no bag storage is available.
- Campus ushers will be present around the Lodge during check-in days to ensure guests are aware of their room location and overnight parking options once they have registered.
- All guests are required to comply with current CDC and California guidelines for face covering usage. Face coverings are available for purchase and will be monitored throughout your stay.
- When weather allows, doors in public spaces may be propped open hand sanitizing stations will be located inside the entry areas of each building.
- Guest Services is located in the Lodge for your convenience.
- 1440 deploys an "Express Checkout" policy. At 9:00 a.m. on your scheduled day of departure your room key will automatically expire and disengage. A copy of your folio will be electronically sent to the email address we have on file; therefore, you do not need to stop by to personally check out of your room. We do ask that you use Zingle to inform us of our campus departure, and if you have any questions or require any communication with a staff member prior to your departure.



## Signature Classes & Workshops

- A variety of classes have been arranged to accommodate social distancing and minimizing crowds.
- Capacities for all classrooms have been reduced to comply with CDC and CDPH guidelines for capacities and social distancing.
- Classroom participation is on a first-come basis class times have been shortened slightly to allow for multiple classes.
- For programs that have class waves, please attend the class designated to you as per your program schedule provided at check-in or via communications through the Zingle texting tool. Please refrain from joining classes outside of those outlined in your program.
- 1440 will schedule classes in outdoor spaces whenever possible to maximize exposure to fresh air while still maintaining physical distancing.
- We ask that you not take the same class back to back to afford others the opportunity to participate.
- All indoor classrooms contain sanitizing stations.
- Class props are available for guest use; props including yoga mats, blankets, blocks, bolsters/pillows and other shared items are disinfected and/or washed following each use. Guests are welcome to bring and use their own equipment if they feel more comfortable.
- Seating for all learning sessions may be assigned by the organizer and use of the same seat must be maintained throughout the program to minimize surface contact.
- Classroom rotations will be enforced to allow time for appropriate cleaning procedures. If a guest wants to attend more than one back-to-back session, they are invited to do so as long as it is outlined in their original schedule.
- All guests are required to comply with prevailing federal, state or local guidelines for face coverings and social distancing for indoor and outdoor spaces.

#### Accommodations Guidelines

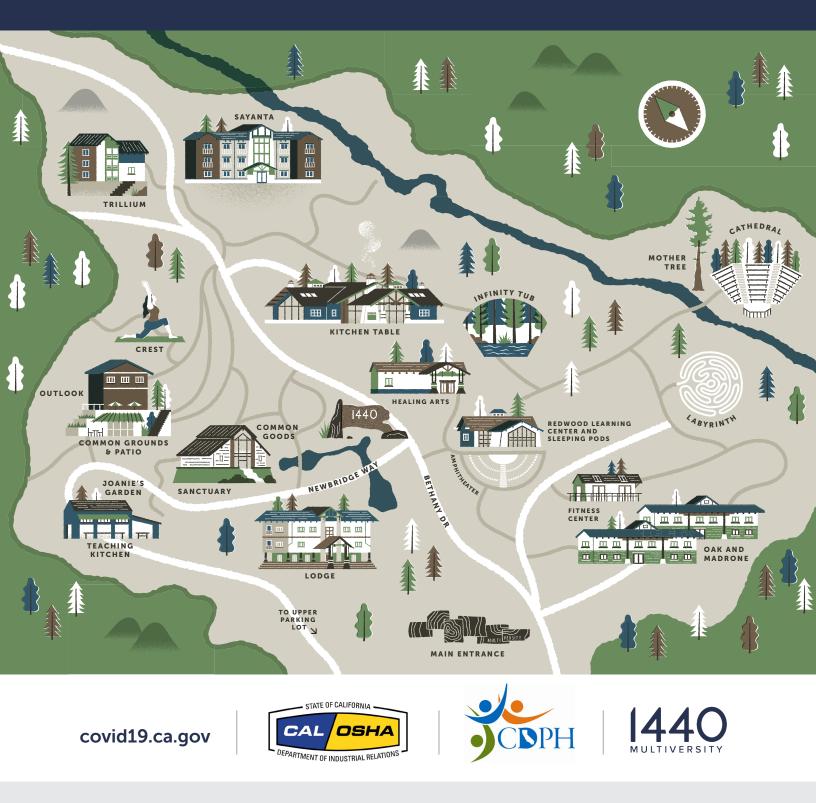
- 1440 has removed all community-shared accommodations from use and will assign all guests to rooms with private bathroom facilities.
- No staff member will enter a guest's room once occupied until after the guest departs. Any requests for supplies or services will be accommodated with no guest contact via the campus service app Zingle. In circumstances where staff must enter the room, staff will arrange to so while limiting personal contact; special requests will be delivered inside the room threshold to avoid entering guest personal spaces.
- When business levels allow, all rooms will be left vacant once unoccupied for 24 hours from the time a guest departs and/or after cleaning.
- In the event of a presumptive case of COVID-19, any such room will be removed from service and quarantined. The room will not be returned to service until the appropriate sanitization process has been completed.
- 1440 disinfection protocols include the use of electrostatic sprayers and FDA approved disinfectants proven effective against COVID-19. If deemed necessary, 1440 will contract with a licensed third-party for room sanitization.
- Safety stations have been installed at the entrance of each guest floor to include sanitizer dispensers and instructions on how to request assistance.
- Only registered guests and employees of 1440 are allowed on campus no outside guests or public visitors are allowed.
- For your safety and security, we ask all guests to observe a 10:00 p.m. curfew all guest buildings will be secured and locked at 10:00 p.m. each night, and registered guests can enter the building with their guest key.
- 1440 is situated on private property. The property is monitored 24/7 by video surveillance and 24-hour safety staff when guests are present.

# Kitchen Table Dining Guidelines

- Select programs will not include meal service for participants.
- Seating locations, dining capacities and access to various dining areas may vary based on program offerings
- All guests and employees are required to have their hands sanitized prior to entering Kitchen Table.
- Traditional seating capacity in Kitchen Table has been reduced and placement of tables and seats reconfigured to allow additional comfort and personal space for our guests.
- Rigorous cleaning and specific sanitizing protocols are in place for food processing and meal operations that follow recommended guidelines established and updated as available on the COVID-19 Resilience Roadmap website.
- All food will be prepared and served by certified food safety staff members, while beverage stations will be available on campus and in our outlets.
- Kitchen Table is closed between meal service hours so proper sanitization and cleaning may occur.

#### Thank you for *creating hope for live well* in our community.

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1440 updates requirements for vulnerable populations and complies with standards provided by Cal/OSHA as well as guidance from the Centers for Disease Control and Prevention (CDC) and the California Department of Public Health (CDPH). 1440 is always prepared to alter its operations as these guidelines change.