



CHECKLIST FOR CHURCHES

– REOPENING for INDOOR SERVICES –

May 2020

Many pastors and church leaders have reached out to us at the 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). We have prepared 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 federal case precedent, federal guidelines, CDC guidance, OSHA guidance, state and local considerations, and valuable input from numerous pastors and church leaders. Please use this resource in conjunction with other resources, including those available at our website: www.pji.org.

These guidelines are not suggested as permanent church policies. Rather, they are suggestions for implementation when your state begins a phased reopening plan. If your state follows the federal phased plan published on April 16, “Guidelines: Opening America Again,” the following checklist is suggested for consultation during Phase One and Phase Two. *(cont. next page)*



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, and Colorado 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 **contact the Pacific Justice Institute toll free at 888-305-9129.**

Sincerely,

Brad Dacus, President



CHECKLIST FOR CHURCHES

– INDOOR SERVICES –

I. Plan and Prepare: Church Leadership and Administration

A. **CDC and Federal Guidelines**

1. Visit the CDC's¹ website for relevant updates on coronavirus and social distancing: www.cdc.gov/coronavirus. The CDC advises 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).²
2. Review federal guidance, available at: www.coronavirus.gov.

B. **State Guidelines**

3. Review all relevant state guidelines regarding churches, gatherings, and social distancing.³
4. Review PJI state-specific memos as relevant to your church, available at: www.pji.org;⁴ obtain legal or other professional advice as necessary.
5. Reach out before reopening for worship services to seek relevant assistance from legal and other professionals and situation-specific advice.

¹ Centers for Disease Control and Prevention (CDC).

² 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) arms' length, between you and individuals outside of your home (non-Household individuals). More information from the CDC is available at:

<https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/social-distancing.html>.

³ The CDC provides a directory of state public health authorities, available at:

<https://www.cdc.gov/publichealthgateway/healthdirectories/index.html>.

⁴ State-specific memos addressing coronavirus-related restrictions are available at:

<https://www.pacificjustice.org/resources/for-churches/legal-insider-covid-19/>. Reach out directly to PJI with questions at: <https://www.pacificjustice.org/get-help/request-legal-assistance/>.



C. **Local Guidelines**

6. Review any local guidelines relevant to your church.⁵
7. 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**

8. Review any relevant insurance policies relating to your church, employees and facilities.
9. Communicate directly with your policy provider if you have any questions or need clarity on your policy.
10. Review and revise your employee handbook, as necessary, to include guidance on social distancing and updated policies and procedures.
11. 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 social distancing guidelines and requirement of hand washing with soap and water for at least 20 seconds.⁶
12. Review social distancing expectations with Worship Team. For example, the Worship Team should each maintain at least six (6) feet of space between them and should wear masks or face coverings as described by the CDC⁷ (Face Coverings) throughout the church service.
13. Ask all members of your Worship Team who will be moving in the public space during the service to wash the clothing, immediately prior to the service, that they will wear at the service.
14. Document updates to policies, meetings to share this information and how this information was disseminated.

E. **Local Outreach**

15. Discuss local considerations with other churches to collaborate and share concerns and ideas.
16. Consider reaching out to any neighbors near your church who may have questions about your reopening for a church service; open a dialogue with

⁵ 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>.

⁶ Please review the CDC Guidance on hand washing, available at: <https://www.cdc.gov/handwashing/when-how-handwashing.html>.

⁷ Federal guidance recommends strongly considering wearing “face coverings” throughout the pandemic, see “Guidelines: Opening Up American Again” (Apr. 16, 2020), available at: <https://www.whitehouse.gov/openingamerica/>. The CDC has guidance on how to create an appropriate Face Covering, available at: <https://www.cdc.gov/coronavirus/2019-ncov/downloads/DIY-cloth-face-covering-instructions.pdf>.



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.

17. 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.

F. **Clean and Disinfect**

18. Review and follow CDC guidelines to disinfect interior spaces thoroughly.⁸
19. Review and follow available state guidelines on cleaning interior spaces and surfaces.
20. Consider whether “deep- cleaning”⁹ is an appropriate precaution for your church; expect that this will take multiple hours and be prepared to document this with the use of professional services.
21. Follow these full cleaning procedures before and after every service or other use of the indoor space.
22. Consider whether the bathroom will need to be cleaned after each individual use.

II. Send Invitations to Parishioners

G. **Send Invitations to Parishioners**

23. Send direct invitations to parishioners in advance of a planned service.
24. 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.
25. 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.
26. 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.

⁸ CDC guidance is available at: <https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility-H.pdf>; see also: <https://www.cdc.gov/coronavirus/2019-ncov/downloads/Mass-Gatherings-Documents-FINAL.pdf>; see also: <https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/checklist.html>.

⁹ Watch PJI video conference titled “How to Safely and Legally Reopen Your Church” (Apr. 23, 2020) for discussion of the Kansas TRO which required deep cleaning (*First Baptist Church v. Kelly*, No. 20-1102-JWB, 2020 U.S. Dist. LEXIS 68267 (D. Kan. Apr. 18, 2020)), available at: www.pji.org.



27. Depending on the size of your congregation, consider asking or assigning parishioners to attend specific services to control numbers at services.

H. **General Advice for Invitees**

- 28. Remind invitees to continue to follow applicable “stay at home” and other restrictions from state and local orders before and after a scheduled service.
- 29. Remind invitees to follow all CDC and state guidelines on social distancing and good hygiene.
- 30. Advise any individual who is “at higher risk for severe illness” not to attend (see <https://www.cdc.gov/coronavirus>); the CDC includes in this category older adults and individuals with underlying medical conditions (including, for example, asthma, HIV, diabetes, obesity, cardiovascular disease and/or cancer).¹⁰
- 31. Advise invitees of all potential risks to provide them with the fullest amount of information and safety advice available; to be included with invitation to parishioners.

I. **Specific Advice for Invitees**

- 32. 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.
- 33. 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.
- 34. Ask invitees to RSVP at least 24-hours in advance of the scheduled service, to facilitate planning by church leadership.
- 35. 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**

- 36. Detail planned procedures for entering and exiting parking lots; include a map with arrows showing flow of traffic if appropriate.
- 37. Detail planned procedures for entering and exiting the church building; include a map with arrows showing flow of foot traffic and aisles if appropriate.
- 38. Advise attendees not to engage in hand shaking or physical contact between Households as part of practicing social distancing.
- 39. 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.

¹⁰ More information from the CDC on individuals considered to be at higher risk for severe illness during the pandemic is available at: <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/index.html>.



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

40. 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 symptoms¹¹ and seek appropriate medical advice.
41. Ask parishioners to seek medical advice if they believe they may have a relevant underlying medical condition as defined by the CDC,¹² prior to undertaking any activity outside of the home.
42. Ask parishioners to refrain from food/drink immediately prior to service, unless medically necessary.
43. Ask parishioners to use bathroom immediately prior to leaving their homes to attend the service.
44. Ask parishioners to wash the clothes they will wear to the service prior to their attendance.
45. Ask attendees to bring their own PPE,¹³ including Face Coverings¹⁴ and gloves; provide links to medically sound tutorials¹⁵ on how to create homemade Face Coverings if necessary.

L. **Include a List Addressing “To Do *After* the Service”**

46. Remind all attendees to wash the clothing they wore to the service again after the service.
47. Ask any individual to contact the church immediately if they experience any flu-like symptoms¹⁶ and to seek medical advice.

¹¹ As of April 29, 2020, the CDC states symptoms of coronavirus include one of either (a) cough or (b) shortness of breath or difficulty breathing; or two or more of these symptoms: (a) fever, (b) chills, (c) repeated shaking with chills, (d) muscle pain, (e) headache, (f) sore throat, or (g) new loss of taste or smell. This list is available at: <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>.

¹² More information from the CDC regarding extra precautions and individuals at higher risk for severe illness is available at: <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/index.html>.

¹³ Personal Protective Equipment (PPE).

¹⁴ Federal guidance recommends strongly considering wearing “face coverings” throughout the pandemic, see “Guidelines: Opening Up American Again” (Apr. 16, 2020), available at: <https://www.whitehouse.gov/openingamerica/>. The CDC has guidance on how to create an appropriate Face Covering, available at: <https://www.cdc.gov/coronavirus/2019-ncov/downloads/DIY-cloth-face-covering-instructions.pdf>.

¹⁵ See, e.g., U.S. Surgeon General Dr. Jerome Adams, “How to Make Your own Face Covering” (Apr. 3, 2020), available at: <https://www.youtube.com/watch?v=tPx1yqvJgf4>.

¹⁶ As of April 29, 2020, the CDC states symptoms of coronavirus include one of either (a) cough or (b) shortness of breath or difficulty breathing; or two or more of these symptoms: (a) fever, (b) chills, (c) repeated shaking with chills, (d) muscle pain, (e) headache, (f) sore throat, or (g) new loss of taste or smell. This list is available at: <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>.



48. Invite attendees to share reflections, comments, and suggestions directly with church leadership to foster ongoing dialogue during the pandemic.

M. Post All Advice Publicly and Outside Church as a Reminder

49. Make signs visible for individuals with explanations of the protocol for the service.

50. Posted signs should give the same advice provided in previously sent invitations to parishioners.

N. Answer FAQs in Advance

51. Have a direct line of communication open to attendees in advance of the service for any FAQs.

52. Include a designated 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.

53. 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 Seating to Less Than 20% Total Capacity

54. While in the earlier stages of reopening, specifically Phase One and Phase Two of the Federal Guidelines,¹⁷ plan to significantly reduce attendance numbers for any service. For example, if the total capacity of a church is 300, no more than 50 persons should be expected to be in attendance at one time.

55. Review confirmed attendance from invitees and plan to space seating accordingly.

56. 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.

57. 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

¹⁷ "Guidelines: Opening Up American Again" (Apr. 16, 2020), available at:

<https://www.whitehouse.gov/openingamerica/>; see also, <https://www.coronavirus.gov/>. The White House and CDC published federal guidelines to establish a model for easing restrictions and reopening the country (Federal Reopening Guidelines). If and when your state has moved out of Phase One and Phase Two under the Federal Reopening Guidelines, it may be possible to increase your church's seating capacity depending on your church's layout. Some states may establish their own phased reopening plans, in which case deference should be given to those state-specific reopening guidelines.



58. Close any vestibule, foyer, or other common spaces to discouraging social congregating before or after the service.

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

- 59. Prop doors open to the church to avoid physical touching of door handles.
- 60. 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.
- 61. 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.
- 62. 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

- 63. Mark out spacing for pews/seating with a minimum of six (6) feet in between individuals or Households.
- 64. Individuals or families that live together (Households) may sit closer together but allow the maximum social distancing possible in between individuals or Households.
- 65. If there is a parking lot connected to the church, use every other parking space (or every third, depending on the size of the spaces); clearly tape or mark off spaces not to be used by attendees.
- 66. If possible, have parking ushers and seating ushers to guide (from an appropriate distance) the flow of traffic in/out of the parking lot and in/out of the church.

R. Configure Physical Space in Advance

- 67. Increase ventilation as much as possible, opening windows and doors, weather allowing.
- 68. Consider not using central heating or cooling, weather allowing; replace standard grade air filters with HEPA¹⁸ filters, if possible.
- 69. Close any adjacent rooms or spaces not necessary for the worship service to encourage proper social distancing before and after the service.
- 70. Tape-off or otherwise close any outdoor playgrounds or other social space attached to the church premises.
- 71. Remind attendees not to socialize without proper physical distancing in the parking lot or other public spaces after the service.

¹⁸ High-efficiency particulate air (HEPA) filters.



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.
77. Consider reducing the length of your service to accommodate the physical needs of parishioners, especially older and younger individuals.

T. **Do Not Distribute or Pass Physical Items**

78. If a form of communion is administered, it must be done without requiring parishioners to touch a plate, food or cup that is also touched by another individual; consider the use of individual, prepackaged communion.
79. Avoid direct physical contact between households; remind parishioners to refrain from embracing, shaking hands, or other forms of physical contact.
80. Do not distribute physical bulletins.
81. Do not pass a physical collection plate, basket or other offering during the service.
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. **Make PPE, including Face Coverings, available for individuals**

83. Federal guidelines suggest Face Coverings¹⁹ be worn in public places during all phases of the pandemic.

¹⁹ Federal guidance recommends strongly considering wearing “face coverings” throughout the pandemic, see “Guidelines: Opening Up American Again” (Apr. 16, 2020), available at: <https://www.whitehouse.gov/openingamerica/>. The CDC has guidance on how to create an appropriate Face Covering, available at: <https://www.cdc.gov/coronavirus/2019-ncov/downloads/DIY-cloth-face-covering-instructions.pdf>.



84. Offer hand sanitizer throughout the building; the CDC recommends sanitizer have a minimum of 60% alcohol.²⁰

V. **Prepare with your Worship Team in advance**

85. Keep your Worship Team, including choir members, physically spaced to observe proper social distancing.

86. Wear Face Coverings at all times, including when singing and preaching.

87. As a potential alternative to wearing a Face Covering while preaching, 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.

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

89. If church leadership becomes aware of a clear, immediate, and imminent threat to the safety of the attendees, or if church leadership becomes unable to follow the protocols listed above, be prepared to immediately disband the service.

90. Prepare in advance for a prompt and orderly end of the service, if necessary.

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. Remind 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 immediately, and to seek medical advice, if they experience flu-like symptoms.²¹

94. Update your emergency operations plan with the help of your local public health department, emergency operations coordinator or planning team, and other

²⁰ The specific CDC guidance is available at: <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/disinfecting-your-home.html>.

²¹ As of April 29, 2020, the CDC states symptoms of coronavirus include one of either (a) cough or (b) shortness of breath or difficulty breathing; or two or more of these symptoms: (a) fever, (b) chills, (c) repeated shaking with chills, (d) muscle pain, (e) headache, (f) sore throat, or (g) new loss of taste or smell. This list is available at: <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>.



relevant partners to include COVID-19 planning; consult OSHA²² guidelines, available at: <https://www.osha.gov/SLTC/covid-19/>.²³

Y. **To Do List for Church After the Service**

95. Repeat facility cleaning in a manner following the same pre-service procedures, including CDC guidance.²⁴

Z. **Continue Alternative/Supplemental Measures and Community Outreach**

96. Continue online services through streaming and social media to expand outreach to your community; PJI's online tutorial for live-streaming broadcast is available at www.pji.org.²⁵

97. Consider parking lot services or drive-in broadcasts following similar protocols.²⁶

98. 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.

99. Direct (non-physical) communication and outreach throughout the pandemic is key.²⁷

100. Maintain dialogue with church leadership teams and parishioners; ensure community contact lists are up-to date and that 'calling trees'—or other

²² Office of Occupational Safety and Health Administration (OSHA), an agency of the United States Department of Labor.

²³ OSHA released a memo on "Interim Enforcement Response Plan for Coronavirus Disease 2019 (COVID-19)" (Apr. 13, 2020), available at: <https://www.osha.gov/memos/2020-04-13/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>; OSHA's general list of resources and information is available at: https://www.osha.gov/SLTC/covid-19/additional_resources.html.

²⁴ CDC Guidance is posted on PJI's website, www.pji.org, and directly from the CDC, available at: <https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility-H.pdf> and <https://www.cdc.gov/handwashing/when-how-handwashing.html>; see also: https://www.cdc.gov/coronavirus/2019-ncov/downloads/Mass-Gatherings-Documents_FINAL.pdf; see also: <https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/checklist.html>.

²⁵ PJI's online tutorial for live-streaming is available at: <https://www.pacificjustice.org/resources/for-churches/how-to-live-stream-a-church-service-during-covid-19-mass-quarantines/>.

²⁶ PJI hosted and recorded a video conference call addressing these topics on April 30, available at: <https://www.pacificjustice.org/resources/for-churches/zoom-video-on-how-to-host-drive-in-outdoor-church-services/>.

²⁷ See U.S. Dept. of Health and Human Services, Center for Faith and Opportunity Initiatives (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>.



practices to account for individuals who may be living alone, elderly, and/or vulnerable — are in place.

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