



## **Baker County Business Operations and Recovery**



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### **BAKER COUNTY RETAIL RE-OPENING PLAN**

The Baker County Commissioners submitted a plan to Governor Brown's office on April 24 outlining a phased approach to reopening businesses, organizations and events in Baker County that are currently closed by the Governor's Stay Home, Save Lives Executive Order 20-12. The plan was developed through coordination between the Baker County Commissioners, Baker County Health Department, St. Alphonsus Medical Center-Baker City, and the County Public Health Officer. The plan proposes three phases for reopening, and includes measures that can be put in place to reduce the risk of transmitting disease. Baker County is anticipating entering Phase 1 of the State of Oregon framework on May 15<sup>th</sup>.

Phase I—State-Regional Guidance: **RETAIL**

Following you will find the Governor's regional requirements for opening in the this time of Pandemic:



## Phase One Reopening Guidance

Governor Kate Brown's framework for Reopening Oregon will help Oregonians restart public life and business while maintaining healthy Oregon communities. The framework outlines actions Oregonians must take to move forward safely.

As the state reopens, it's important to remember the risks. We must all do our best to protect ourselves and one another. If we all follow these actions, we will help save the lives of our colleagues, neighbors, friends, and family members.

### These actions include:

- Stay home if you are sick.
- To avoid exposure to COVID-19, people who are at risk for severe complications (over age 60 or have underlying medical conditions) should stay home even if you feel well.
- If you become symptomatic (cough, fever, shortness of breath) while in public, please return home and self-isolate immediately. Contact your health care provider if you need medical attention.
- Practice good hand hygiene with frequent handwashing for at least 20 seconds or use hand sanitizer (60-95% alcohol content).
- Cover coughs/sneezes with elbow or tissue. If you use a tissue, immediately discard tissue in garbage and your wash hands.
- Avoid touching your face.
- Practice physical distancing of at least six (6) feet between you and people who you do not live with.
- Use cloth, paper or disposable face coverings in public. As Oregon is reopening and restrictions are being lifted on businesses and public spaces, it may be difficult to ensure that you can stay six (6) feet away from others at all times.
- Stay close to home. Avoid overnight trips and minimize other non-essential travel, including recreational day trips to destinations outside the community where you live. Travel the minimum distance needed to obtain essential services; in rural areas, residents may have to travel greater distances for essential services, while in urban areas, residents may only need to travel a few miles for those services.

You can get this document free of charge in other languages, large print, braille or a format you prefer. Contact Mavel Morales at 1-844-882-7889, 711 TTY or [OHA.ADAModifications@dhsosha.state.or.us](mailto:OHA.ADAModifications@dhsosha.state.or.us).



May 7, 2020

## Oregon General Guidance for Employers on COVID-19

### General considerations for your workplace:

- Comply with any of the Governor's Executive Orders that are in effect.
- Know the signs and symptoms of COVID-19 and what to do if employees develop symptoms at the workplace.
- Understand how COVID-19 is transmitted from one person to another—namely, through coughing, sneezing, talking, touching, or via objects touched by someone with the virus.
- Make health and safety a priority by implementing safeguards to protect employees and the public. Federal and state guidelines, including sector-specific guidance, will help you determine which safeguards are recommended or are required, for example, use of personal protective measures such as face coverings or masks.
  - CDC has detailed [general guidance](#) to help small businesses and employees prepare for the effects of COVID-19.
  - Oregon's specific guidelines for the following sectors can be found at (<https://govstatus.egov.com/OR-OHA-COVID-19#collapseOHAGuidance>):
    - Health care
    - Transit
    - Retail
    - Childcare/Early childhood education
    - Personal services
    - Outdoor recreation
    - Restaurants
- Consider modifying employee schedules and travel to reduce unnecessary close physical contact (physical distance of less than (6) six feet between people).
- Be aware of protected leave requirements and plan ahead for any anticipated workforce adjustments.

## Modification of employee schedules and travel

Considerations for modifying employee schedules and travel as feasible:

- Identify positions appropriate for telework or partial telework, including consideration of telework for employees who are at higher risk for severe COVID-19 complications due to underlying medical conditions identified by the CDC.
- Stagger or rotate work schedules or shifts at worksites to ensure employees are able to sufficiently maintain physical distancing.
- Limit non-essential work travel.

## Workplace safety

Implement workplace safeguards as feasible or when required. [See also sector-specific guidance here.](#)

- Implement physical distancing measures consistent with the Governor's Executive Orders and state guidance.
- Increase physical space between workers. This may include modifications such as markings on the floor demonstrating appropriate spacing or installing plexiglass shields, tables or other barriers to block airborne particles and maintain distances. Review and follow any sector-specific guidance issued by the state that recommends or requires specific physical distancing measures.
- Restrict use of any shared items or equipment and require disinfection of equipment between uses.
- Reinforce that meticulous hand hygiene (frequent and proper handwashing) is of utmost importance for all employees. Ensure that soap and water or alcohol-based (60-95%) hand sanitizer is provided in the workplace. Consider staging additional hand washing facilities and hand sanitizer for employees (and customer use, if applicable) in and around the workplace.
- Regularly disinfect commonly touched surfaces (workstations, keyboards, telephones, handrails, doorknobs, etc.), as well as high traffic areas and perform other environmental cleaning.
- Employers may encourage or require employee use of cloth or disposable face coverings as indicated by sector-specific guidance. If employers require use of cloth face coverings, employers must provide cloth or disposable face coverings for employees.
- Consider upgrades to facilities that may reduce exposure to the coronavirus, such as no-touch faucets and hand dryers, increasing fresh-air ventilation and filtration or disinfection of recirculated air, etc. Consider touchless payment method when possible and if needed.

- Limit the number of employees gathering in shared spaces. Restrict use of shared spaces such as conference rooms and break rooms by limiting occupancy or staggering use.
- Restrict non-essential meetings and conduct meetings virtually as much as possible. If in-person meetings are necessary, follow physical distancing requirements.
- Consider regular health checks (e.g., temperature and respiratory symptom screening) or symptom self-report of employees, if job-related and consistent with business necessity.
- Train all employees in safety requirements and expectations at physical worksites.

## **Employee leave and health insurance**

Be aware of federal and state protected leave and paid leave laws (if applicable) and requirements for health insurance coverage:

- Advise employees to stay home and notify their employer when sick.
- Review and comply with any applicable requirements for maintaining employee health insurance coverage.
- Healthcare provider documentation is generally not required to qualify under federal and state leave laws due to COVID-19 related circumstances or to return to work.
- Review and comply with any applicable required federal and state leave law protections for employees who are unable to work due to COVID-19 related circumstances.
- Determine whether your business can extend paid or unpaid leave and if feasible adopt a temporary flexible time off policy to accommodate circumstances where federal or state law does not provide for protected or paid leave.
- Develop an action plan consistent with federal and state guidance if an employee develops symptoms while in the workplace, tests positive for COVID-19 or is determined to be presumptively positive by a public health authority.

## **Downsizing and layoffs**

If downsizing or other workforce adjustment measures are necessary, adhere to applicable state and federal requirements regarding notice of layoffs and recalls for affected workers:

- Determine whether alternatives to layoff may be feasible such as furloughs or reduced schedules.
- Refer employees to resources including filing for unemployment benefits and community services.
- Create a plan for recalling employees back to work.

## Union workplaces

If you have a unionized workforce, determine obligations to bargain with the union or unions which represent your employees.

### Links to additional information:

For the most up to date information from Public Health and the CDC:

- <https://sharedsystems.dhsoha.state.or.us/DHSForms/Served//LE2356.pdf>
- <https://www.oregon.gov/oha/PH/DISEASESCONDITIONS/DISEASESAZ/Pages/emerging-respiratory-infections.aspx>
- <https://www.cdc.gov/coronavirus/2019-ncov/index.html>

### For COVID-19 Guidance from the State and Federal Sources:

Resources for businesses and employers to plan, prepare, and respond to COVID-19, which is available in English, Spanish, Chinese, Vietnamese and Korean:

[www.cdc.gov/coronavirus/2019-ncov/community/organizations/businesses-employers.html](http://www.cdc.gov/coronavirus/2019-ncov/community/organizations/businesses-employers.html)

- Oregon Bureau of Labor and Industries: Coronavirus and Workplace Laws. <https://www.oregon.gov/boli/Pages/Coronavirus-and-Workplace-Laws.aspx>
- Department of Labor Guidance: Employer Paid Leave Requirements for Covid-19 related circumstances. <https://www.dol.gov/agencies/whd/pandemic/ffcra-employer-paid-leave>
- General guidance for businesses and employers to help them plan, prepare, and respond to COVID-19: [www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html](http://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html)
- Workplace cleaning and disinfecting recommendations, including everyday steps, steps when someone is sick, and considerations for employers: [www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html](http://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html)
- Safety practices for exposures in the workplace:
  - Cleaning and disinfection practices post exposure: <https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html>
  - Safety practices for workers who may have had exposure to a person with COVID-19: <https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html>

- OSHA guidance on preparing workplaces for COVID-19:
  - Oregon OSHA: <https://osha.oregon.gov/Pages/re/covid-19.aspx> (English and Spanish links)
  - National OSHA: English: [www.osha.gov/Publications/OSHA3990.pdf](http://www.osha.gov/Publications/OSHA3990.pdf), and Spanish: [www.osha.gov/Publications/OSHA3992.pdf](http://www.osha.gov/Publications/OSHA3992.pdf)
- Oregon Employment Department: COVID-19 Related Business Layoffs, Closures, and Unemployment Insurance Benefits:  
[https://govstatus.egov.com/ORUnemployment\\_COVID19](https://govstatus.egov.com/ORUnemployment_COVID19)
- COVID-19 insurance and financial services information:  
<https://dfr.oregon.gov/insure/health/understand/Pages/coronavirus.aspx>

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## Phase One Reopening Guidance

Sector: Retail

Specific Guidance for Retail Stores:

### **Retail stores are required to:**

- Limit the number of customers in the retail store and focus on maintaining at least six (6) feet of distance between people and employees in the store. Store management should determine maximum occupancy to maintain at least six (6) feet of physical distancing, considering areas of the store prone to crowding (like aisles) and limit admittance accordingly.
- Post [clear signs](https://healthoregon.org/coronavirus) (available at [healthoregon.org/coronavirus](https://healthoregon.org/coronavirus)) listing COVID-19 symptoms, asking employees and customers with symptoms to stay home, and listing who to contact if they need assistance.
- Use signs to encourage physical distancing.
- Frequently clean and disinfect work areas, high-traffic areas, and commonly touched surfaces in both customer/public and employee areas of store. Wipe down changing room doorknobs, walls and seating between each customer use.
- Require all employees to wear cloth or disposable face coverings. Businesses must provide cloth or disposable face coverings for employees.

### **To the extent possible, retail stores should, but are not required to:**

- Strongly encourage all customers to wear cloth or disposable face coverings. If a store sets a policy that all customers are required to wear cloth or disposable face coverings, store management should consult with their legal counsel to determine whether such a requirement can be enforced.
- Consider placing clear plastic or glass barriers in front of cashiers or customer service counters, or in other places where maintaining six (6) feet of physical distance between employees and customers is more difficult.
- Encourage one-way flow with marked entrances and exits, but do not block egress for fire exits. Use signs to direct one-way flow of traffic.
- Use signs and tape on the floor to maintain physical distancing while waiting for cashiers.
- Prohibit customers from trying on items that are worn on the face (cloth masks, scarves, headbands, eyewear).
- Decide whether to re-open fitting rooms. If fitting rooms are re-opened, customers should wash hands or use hand sanitizer before and after trying on clothes. Retailers



should provide hand sanitizer or hand washing stations near fitting rooms. Note: There are no scientific data to indicate that clothing items are a major means of spread of the coronavirus. Any risk from this exposure is likely to be very low. Items that have been in a fitting room can be set aside for a day or longer if the retailer is concerned about perceived risks from clothing that has been tried on by customers.

- When processing returns, employees should wash hands or use hand sanitizer before and after handling items. Retailer may set items aside for a day or longer if concerned about perceived risks of exposure.
- Consider offering alternative order ahead and pick up options, such as curbside pickup as appropriate and applicable.
- Review and implement [General Guidance for Employers](#), as applicable.

## **Specific Guidance for Shopping Centers and Malls:**

Shopping center and malls must:

- Keep any common area settings such as food courts and seating areas configured to support at least six (6) feet physical distance between parties (chairs, benches, tables).
- Determine maximum occupancy within the shopping center or mall to maintain at least six (6) feet physical distancing and limit admittance accordingly.
- Post signs at entrances, exits and common areas (seating areas, food courts, etc.) to discourage groups from congregating, and remind customers and employees to keep six (6) feet of physical distance between individuals or parties while waiting.

To the extent possible, shopping centers and malls should:

- Designate specific entrances and exits to the shopping center or mall to constrain traffic flow and encourage physical distancing between customers. For entrances with a single door or single pair of doors, consider designating it entrance only or exit only if another entrance/exit exists and one-way flow through the area is feasible. Do not block egress for fire exits.

## **Additional Resources:**

- [OHA Guidance for the General Public](#)
- [OHA General Guidance for Employers](#)

## **Additional State Resources Needed:**

- Reopening checklist
- Symptoms and resource signs
- Signs to discourage gathering

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## Operation Open Doors Checklist

*This checklist represents guidance from members and subject matter experts, and is intended to highlight key topics to consider as retailers seek to re-open operations. Your individual facts and circumstances will be unique, and we encourage you to work with your preferred legal and financial advisors to adapt this guidance to your specific situation. We also recommend using this checklist in conjunction with our [Interactive 50-State Tracker Map](#) (also found in the Members section of [www.nrf.com](http://www.nrf.com)). NOTE: Concepts to consider well in advance of re-opening are in blue font throughout this checklist.*

### Employment

*The heart of returning to work is the workforce. The need to plan ahead is not limited to the initial transition back to work, but rather includes preparing for likely employee relations scenarios that will arise after returning to work. While some of these employee relations issues may be unique to COVID-19, others will not be novel, but how an employer needs to respond very well may be. Assessment of current policies and practices should be undertaken to ensure they meet the needs of the workforce and business during this transition back to work, along with the creation of new policies. In particular, development of a protocol to limit the spread of COVID-19 and how to respond if an employee contracts COVID-19 is essential. Likewise, employers should plan for how to respond to employees who are in vulnerable populations or are fearful of returning to work. Employers would also be well-served to assess factors competing with an employee's ability or interest in returning to work, such as child or elder care responsibilities or generous unemployment insurance benefits.*

- [Appoint Return to Work Team](#): Consider HR, IT, facilities, health and safety team, office managers and senior management who can make company-wide decisions; identify new roles and responsibilities. If a COVID-19 “playbook” is created, revisit the document frequently to ensure that practices and protocols are updated based on changing conditions and guidance.
- [Determine Transition Plan](#): Consider whether to (i) reopen operations and get employees back to work as quickly as permitted under the applicable law, or (ii) implement a slow or phased approach. Develop a process to handle re-integration logistics. Recognize your approach may differ in different parts of the country.
- [Determine Which Shelter-in-Place Law and Orders Apply](#): Laws will vary by jurisdiction, and the law is likely to impose different requirements or restrictions on “essential” and “non-essential” retailers. Monitor and follow all applicable employee and customer safety directives. Provide employees with the tools to engage with law enforcement

to the extent practices at the retail location are questioned. Visit our [Interactive 50-State Tracker](#) for the latest on Shelter-in-Place and Return to Work orders.

- [Identify Who Returns to Work and When](#): Consider timing issues (e.g., bringing back all employees, or staggering return to work dates), amount of notice to provide employees, and how many employees will be allowed in store at once (including any applicable occupancy limits required by law). Determine if individual employees are safe to return to work by implementing screening measures (see below), and consider plans for “at-risk” employees. Evaluate whether any roles that have traditionally been performed in store can and should be performed remotely now.
- [Workplace Policies and Other Practices; Training](#): Develop new or update existing policies and other practices, and consider how such policies or protocols will be communicated to employees, including formal training. Policies to consider include:
  - Paid time off from work (e.g., paid sick leave, paid time off, vacation, personal days, etc.).
  - Leaves of absence (e.g., family and medical leave [including for childcare during school and summer program closures], personal leave, etc.) and accommodation requests, including whether medical certification can be obtained.
  - Complaint procedure, including conducting remote investigations.
  - Whistleblower protections, with a particular emphasis on protocols for responding to employee complaints of violations of COVID-19 laws.
  - Expense reimbursement for PPE or other workplace equipment.
- [Transition from Furlough](#): Prepare a communication plan for calling employees back to work. Review local laws concerning recall and worker retention rights. Prepare strategy for securing onboarding paperwork, including I-9s, for employees who were laid off (especially in states where a furlough constitutes a termination). Create a plan for notifying local unemployment agency of furloughed employees who refuse to return to work.
- [Determine How to Handle Refusal to Work and Requests for Accommodations](#): Consider issues around “at-risk” groups, accommodations due to logistical and other barriers to returning to the worksite, exceptions and processes for parents/caregivers when schools are closed or other caregivers are unavailable, etc. Plan for swift transition to Human Resources if an employee’s rationale for not wanting to return to work or requesting an accommodation warrants engagement in the interactive process.
- [Establish Well-Defined Protocol for Dealing with Suspected and Confirmed Cases of COVID-19](#): What specific information is the employee required to disclose and to whom? With whom will the information be shared? Determine if there is any requirement to notify any government agencies, public authorities, or third parties. If

- possible, implement workforce contact tracing protocol to identify and inform individuals who have been in close contact with the affected employee, and ensure such protocol complies with privacy and disability discrimination laws. Plan ahead for the need to contact trace by limiting scope of employee contact through scheduling and limiting workspaces. Develop protocol for how long employees with suspected or confirmed cases of COVID-19, as well as the individuals in contact with those employees, must remain away from work. Consider how to respond if the contact is from a customer or a close contact of an employee.
- Consider Screening/Testing Measures: Consider different screening processes and protocols, including questionnaires, [self-certifications](#), temperature and other symptom checks, and virus and/or antibody testing, if available and legally permissible. See Health section below.
  - Determine Rules for Visitors, Vendors and Other Workers in the Workplace: Determine how or to what extent the above policies, practices, and protocols will be applicable to temporary workers, staffing agency workers, independent contractors, vendors, delivery workers, and other visitors when they are in the workplace. Create a plan & guidance for employee who must engage with visitors, including customers, who are not adhering to the required employer or state/local mandates.
  - Consider Potential Changes in Pay, Hours, Schedules, Duties, Wage/Hour. Consider how bonuses, incentive pay, or free benefits (such as a daily free meal) may implicate regular rate calculations, potentially impacting overtime, vacation, and sick time pay.
  - Assess Employee Benefits Offerings: Assess offerings to support employee physical and mental health. Explore remote Employee Assistance Programs.
  - Determine Which Workplace Safety Law and Orders Apply: Law will vary by jurisdiction, and the law is likely to impose different requirements for masks and other PPE, social distancing protocols, and cleaning requirements, in addition to related notices. Include in your consideration the impact of social distancing requirements on shared employee spaces, such as the break room. See Health section below. Also, reference our [Interactive 50-State Tracker](#) for the latest on state and municipal PPE and social distancing requirements.
  - Evaluate Hiring Practices/Hiring Needs in Light of COVID-19: Evaluate the need to hire additional employees due to increased business needs or unavailability of current employee pool. Assess ability to conduct applicant screening and onboarding remotely. Develop recruiting checklist and interview guidelines that specific address avoiding questions about an applicant's health or health history to avoid the appearance of discriminatory practices.

## Logistics/Operations

*A returning workforce needs a place to return to and goods to sell. This section will highlight various key considerations to keep in mind as you seek a return to normal (or quasi-normal) operations for your distribution centers, stores, and supply chains.*

- [Appoint Return to Work Team](#): Consider HR, IT, facilities, health and safety team, office managers and senior management who can make company-wide decisions; identify new roles and responsibilities. If a COVID-19 “playbook” is created, revisit the document frequently to ensure that practices and protocols are updated based on changing conditions.
- [Facilities: Deciding Which to Open](#)
  - [Economic Analysis](#): Pre-crisis performance vs. re-opening projections; also, cost of lease termination should a given location no longer prove viable post-COVID.
  - [Co-Tenancy Considerations](#): Have COVID-19 closures implicated one or more co-tenancy provisions in your portfolio? If so, have you taken any necessary steps to claim the relief provided under your lease(s)?
  - [Evaluate the Landlord/Tenant Relationship](#): Is this a multi-site Landlord with cross-default considerations? Is this a location where we did not pay (or short-paid) April or May rent? If so, has a strategy been devised to restore that relationship?
  - [Sublease / Assignment / Give Back / Repurposing Opportunities](#): Is this a site where it might make more sense to seek an alternative user or convert to a support use (e.g., ghost kitchen, BOPIS, curbside delivery, or dark store)? Do you have rights in your lease to “give back” square footage and shrink your footprint?
  - [Retrofit](#): Do the costs of post-COVID retrofits (to meet new health and safety requirements - including social distancing) render a site no longer financially viable?
- [Facilities: Preparing the Store for Opening](#)
  - For leased properties, work with your landlord and your local jurisdiction to obtain early access to store location to ready it for return-to-work (deep cleaning, retrofitting as necessary for new regulations, installation of new signage [see below], etc.).
  - Thoroughly inspect facilities for any damage or issues caused by vacancy including mechanical, air, and water systems.
  - Clean and prepare equipment for startup; install sneeze guards or other protective measures, as necessary and/or required.
  - Consider facility enhancements such as increased fresh air circulation, installing highest efficiency rated filter recommended or allowed by manufacturer.

- Identify which vendors and/or distribution centers are functioning, and the extent to which they may be delayed or limited in their operations. Establish contingency plan for vendor disruptions.
- Establish protocol for monitoring store occupancy (metering) in compliance with any applicable laws.
- If applicable, establish procedure for use of escalators and elevators to avoid crowding (e.g., elevator attendants, queue management for waiting passengers, etc.).
- In multi-tenant situations, obtain clarity on *what* customer screening (e.g., temperature) may be required and *who* will perform it (landlord on behalf of all mall tenants, each individual tenant, etc.). Reference our [Interactive 50-State Tracker](#) for the latest on screening requirements.
- If customer screening is to occur within your store, identify an appropriate location for such screening (such that privacy and social distancing protocols are respected).
- Signage
  - Familiarize yourself with new signage requirements & needs (occupancy, social distancing, customer flow, BOPIS, etc.).
  - Consider the public relations and health & safety (e.g., capacity) concerns related to any promotional signage you might otherwise normally employ.
  - Do you need to limit quantities of certain items or implement other anti-hoarding signage?
- Supply Chain & Inventory
  - Assess supply needs and explore options for sourcing additional supplies required for business operations; assess how to best leverage existing relationships with vendors.
    - Create a plan for how you will source and distribute cleaning products and PPE, accounting for existing and/or future shortages. Establish a protocol to monitor this on a frequent basis as rules and health guidance ebb and flow with the prevalence of the virus.
    - If you have international operations, consider current challenges with respect to shipping certain products (such as PPE) across borders. You may have to modify your traditional supply chain routing.
  - Establish procedure for regularly disinfecting inventory and newly-received deliveries.
  - Establish protocols for handling and processing shipping and receipts (including disinfection).

- Evaluate current situation as it relates to ports of entry and trucking logistics for your product. Will this impact your ability to timely re-supply, both now and in the medium term? Keep an eye out for future legislation which might have the effect of requiring truck drivers to quarantine upon crossing state-lines, etc., thereby further disrupting the supply chain.
- Business Hours
  - Adjust store hours of operation, as necessary, to support social distancing efforts by limiting store traffic.
  - Ensure staff has sufficient time to rest, sanitize and restock inventory.
  - Consider offering seniors and other high-risk individuals exclusive early hours.
  - Consider increasing pickup hours to serve more online customers.
- Establish Protocol for Vendors & Non-Employees
  - Notify vendors of re-opening, and any revised protocol as it relates to store entry, deliveries, paperwork, etc.
  - Consider implementing measures to ensure vendor safety, including:
    - Disabling/suspending access (e.g., temporarily suspending all non-employee truck drivers from entering stores, warehouses and manufacturing plants).
    - Transitioning to contactless signatures/e-signatures for deliveries.
    - Adjusting store delivery windows to spread out deliveries.
    - Requesting that vendors accessing your store locations to direct their employees follow all social distancing guidelines and health directives issued by the applicable public authorities.
- Security Operations
  - Revise security protocol to conform to local & state health directives.
  - Consider in-store announcements to remind customers of proper traffic flow and queuing protocols.
  - How might your anti-shoplifting procedures change in the COVID-19 era?
  - Consider employee training in safe de-escalation - both in the case of shoplifting as well as customer violation of health and safety rules.
- Promote "Contactless" Shopping Options
  - On-line shopping.
  - Contactless payment options (e.g., RFID credit and debit cards, Apple Pay, etc.).



- Self-checkout.
- Pickup and delivery services.
- Merchandise
  - Returns and Exchanges
    - Consider suspending or modifying return and exchange policies.
    - Establish procedures for processing, handling, and disinfecting returns and exchanges. Consider requiring returned items to be sealed and stored separately, requiring employees to use PPE to process, handle and disinfect returns, and storing returns in isolation for a safe time period before returning them to sales floor.
  - Fitting Rooms
    - Decide whether to re-open fitting rooms.
    - If you decide to open them, ensure fitting rooms are “customer ready” by cleaning prior to any customer usage. Similarly, ensure that fitting room is properly sanitized after customer use.
    - Encourage customers to use hand sanitizer/wipes before trying on items and to keep protective mask on during fitting.
    - Determine procedure for disinfecting fitting room items (not just clothing, but also jewelry, eyewear, etc.). For example, consider having items that have been tried on segregated and steamed, and wait a safe time period before putting items back on sales floor.
  - Fragrance & Beauty Testers
    - Prohibit customer use; consider entirely removing from sales floor.

## Health Policy

*A returning workforce needs appropriate health policies, practices, engineering controls, and protective equipment. Employer practices should be designed to discourage contagious employees and customers from entering the store, screen those who enter, and mitigate the effect of contagious individuals in the store. This section will highlight various key health protections and safeguards to keep in mind as you seek a return to normal (or quasi-normal) operations for your distribution centers, stores, and supply chains.*

### Social Distancing

- Place signage in conspicuous locations throughout the store, particularly high-traffic areas such as entrances and exits, checkouts, fitting rooms, etc. Signage may include:
  - Asking invitees and employees not to enter the store if they are sick or have felt sick within the last 72 hours.
  - Encouraging invitees and employees to maintain six feet of distance at all times, per CDC guidelines.
  - Floor markers located six feet apart any place where invitees are likely to queue.
  - Entrance-exit or one-way only signs.
  - Recommended hygiene practices, how to stop the spread of germs.
  - CDC posters promoting frequent and thorough handwashing in all restrooms.
  - Requesting customers temporarily cease using reusable bags, or to bag their own purchases if they choose to use reusable bags, and to clean reusable bags
  - Information on pick-up/carryout options.
  - Temperature screening of customers through infrared thermometers or thermal scanners, with employees or third party contractors turning away employees with fevers.
- Consider programming in-store audio messaging to frequently remind employees and customers to follow CDC guidance on hygiene and physical distancing.
- For high-traffic retailers and retailers with checkout counters that do not allow adequate distance between the customer and employee, consider installing Plexiglas “sneeze-guards.”
- Capacity limits have been considered; if implemented, distance markers are located outside of store to allow for queuing while maintaining physical distance; employees can also be assigned to assist customers with waiting to enter.
- To the extent possible, use of point-of-sale terminals and other workstations is staggered.

- Implement and encourage use of contactless payment options for employees and patrons, contactless signatures for deliveries. If contactless signature for deliveries is not possible, require employees to use own pen.
- Where possible, employee shifts and meal breaks have been staggered to avoid crowding.
- High-traffic areas have been widened to the extent store configuration allows.

#### Face Masks and Personal Protective Equipment (PPE)

- Encourage or require employees and customers to wear approved facial coverings, gloves, and personal protective equipment (PPE) at all times, if possible.
  - Offer face masks and/or PPE to customers who enter the store without any.
- Determine whether employees will be permitted to use their own face masks and PPE, and on what terms and conditions, with special attention to potential use of filtering face-piece respirators (e.g. N95 or equivalent)
- Designate receptacles for discarded face masks PPE.

#### Cleaning / Sanitization

- Obtain cleaning products that are on the EPA's List N: Disinfectants for Use Against SARS-CoV-2.
- Cleaning "kits" including disinfectant wipes or sprays, disposable gloves, paper towels, masks, hand sanitizer and other cleaning supplies are readily accessible throughout store, including point of sale terminals and other stations that will be cleaned periodically throughout the day.
- Implement a cleaning regime targets frequently touched surfaces and spaces, which are most likely to result in the transmission of communicable diseases:
  - General:
    - Shopping carts and baskets.
    - Door and drawer handles.
    - Light and other power switches (consider signage to keep lights on at all times, or utilizing exiting motion sensor capabilities).
    - Shared tools such as pricing guns, pallet jacks, tape guns, box cutters, etc.
    - Chairs, tables, and benches.
    - Vending machines and self-serve kiosks.
    - Refrigerators, microwave, and other frequently touched objects and surfaces in employee breakroom.

- Time clocks
- Point of sale/checkout:
  - Cash register, including touch screens, keyboards, mouse.
  - PIN Pads (touch screen, keypad, and pen).
  - Checkout counter and/or conveyor belt.
  - Cabinet pulls.
  - Checkout dividers.
- Restrooms (consider temporarily closing restrooms to public, if possible):
  - Door handles and flush levers.
  - Toilet bowl and toilet paper holder.
  - Sinks and faucets.
  - Paper towel holders and/or air dryers.
  - Diaper-changing stations.
- Sales floor:
  - Fixtures with handles or pulls.
  - Any other identified “high-touch” surfaces.
- Hand sanitizer is available throughout store for customers and employee use, including store entrance(s), and checkouts.

Employee Training

- Social distancing guidelines and expectations.
- How to monitor personal health and body temperature at home.
- How to properly wear, remove, and dispose of face masks and PPE.
- Guidance on how to launder cloth face masks and uniforms.
- Cleaning protocol, including how to safely and effectively use cleaning supplies.