

Retail COVID Safety Operational Plan

Making safety planning a priority to protect your employees and customers is essential to re-opening retail businesses after a pandemic. This Safety Operational Plan¹ provides you a list of requirements and recommendations from Washington State's Department of Health, Labor and Industries, and the federal government's Centers for Disease Control and Prevention.

When the entire retail sector is prepared to meet this challenge by giving consumers the assurance that the re-opening is gradual and well-thought out, customers would come back in confidence.

Sections in this document:

- Preparation for re-opening and checklist
- Phase 1
- Phase 1.5
- Phase 2
- Phase 3

Preparation for re-opening

Please follow this checklist to prepare for each phase of your re-opening. Each item requires your regular assessment throughout each phase. We **highly recommend that you have a person assigned to review of these processes on a continual basis** and to make sure Personal Protective Equipment (PPE), hand soap/sanitizers supplies are on hand sufficiently, as more employees and customers to return to the store.

Preparation Checklist:

- Posters:** display the following required posters and information to inform employees about safe practices.
 - [COVID-19](#) Washington Labor and Industries (L&I)
 - [Germ Buster Hand Washing](#) Washington Department of Health (DOH)
 - [Stop the Spread English](#) Center for Disease Control (CDC)
 - [Stop the Spread Spanish](#) Center for Disease Control (CDC)



- Employee face covering assessment and accommodations required**

According to the "[Face Coverings, Masks, and Respirator Choices](#)" guidance issued by the Labor and Industries, not all face coverings are made equal. Employers need to not only provide face covering, but they are required to [assess the level of risk](#) at their workplace and provide employees with the appropriate face covering according to work tasks.

In Governor Inslee's "[Safe Start Washington: Phased Reopening County-by-County](#)" document, cloth facial covering is required for all employees as of June 8 with a few exceptions:

¹ For the latest version this Safety Operation Plan and other COVID safety and regulatory compliance updates, please visit [Washington Retail's COVID Resource Guide](#).

- Working alone in an office, vehicle, or at a job site
- Employees with hearing issues or when communicating with others that need facial cues or mouth movements as a part of communication
- Employees with a medical condition or disability that need accommodation with medical documentation from a healthcare provider
- When the job has no in-person interaction

On June 26th , a [statewide facial covering mandate](#) was instituted. Read full [memo](#). A separate [proclamation specific to Yakima county](#) was issued due to the very high rates of infection in that region.



On July 7th the Governor released [mandatory face covering requirements](#).

- **PPE:** Create a plan to source and distribute PPE and a way to track inventory and/or anticipate reordering due to pro-longed shipment or shortage of supplies.
 - Face coverings - Employers can issue face coverings or can approve of employee supplied cloth face coverings.² For retail businesses, face covering is sufficient and would prevent competing for essential PPE healthcare workers need.
 - Gloves – For employees whose hands are bothered by frequent washing, train them on the proper way to remove gloves without touching the outer layer. See this short [RS SafetyTV video](#).
 - PPE disposal - provide a no-touch-to-open trash bin dedicated for used PPE disposal. Dispose the trash bag at the end of each workday.



□ **Employee Health Screening:**

Conducting daily in-person or virtual health checks (e.g., symptom and/or temperature screening) of employees before they enter the facility, in accordance with state and local public health authorities and, if available, your occupational health services:

- If implementing in-person health checks, conduct them safely and respectfully. Employers may use social distancing, barrier or partition controls, or personal protective equipment (PPE) to protect the screener. However, reliance on PPE alone is a less effective control and is more difficult to implement, given PPE shortages and training requirements.
 - See CDC’s “Should we be screening employees for COVID-19 symptoms?” section of [General Business Frequently Asked Questions](#) as a guide.
- Complete the health checks in a way that helps maintain social distancing guidelines, such as providing multiple screening entries into the building.
- Follow guidance from [the Equal Employment Opportunity Commission](#) regarding confidentiality of medical records from health checks.

² [L&I DOSH Directive](#) 1.70, page 8, 04/27/2020

- To prevent stigma and discrimination in the workplace, make employee health screenings as private as possible. Do not make determinations of risk based on race or country of origin. Maintain confidentiality of each individual’s medical status and history by saving such information separate from their personnel files.
- Hand washing** needs to be available and employees must regularly wash their hands.
- Cleaning products:** Create a plan to ensure sourcing and distributing cleaning products, accounting for existing and/or future shortages. Here is a [list of cleaning products](#) recommended by the Environmental Protection Agency (EPA) for COVID-19.
- Breakroom:** Adjust seating in break rooms and other common areas to reflect social spacing practices.
- Communication protocol with vendors:** notify vendors of re-opening, and any revised protocol as it relates to store entry, deliveries, paperwork, etc.
- Pre-disinfect all areas:** workspaces, bathrooms, commonly used areas, and shared electronic equipment. Here is a [list of cleaning products](#) that are on the EPA’s recommended list N: Disinfectants for Use Against SARS-CoV-2.
- Consider cross-training:** If you do not bring back all your employees yet, consider cross training to ensure that you have staff in place to cover all functions necessary to keep your doors open. Providing procedures manual of the tasks in the shop is helpful.
- Handling Returns and Exchanges:**
 - Consider suspending or modifying return and exchange policies.
 - Establish procedures for processing, handling, and disinfecting returns and exchanges such as:
 - Require returned items to be sealed and stored separately, employees who process returned items need proper PPE, disinfect items, and store them in isolation for a safe time period before returning them to sales floor.
- Fitting Rooms:**
 - Decide whether to re-open fitting rooms.
 - Ensure fitting rooms are “customer ready” prior to any customer usage and sanitized after customer use.
- Employee Training:**
 - [Review COVID-19 virus basics](#) Here is a good presentation for instructing employees on virus basics [English](#) [Español](#)
 - [Social distancing guidelines and expectations](#)
 - [Personal health and body temperature monitoring at home](#)
 - Proper wearing of manufactured [face coverings](#)
 - Where to dispose of used PPE
 - How to make, wear, and launder [cloth face coverings](#)
 - [Cleaning protocol](#) to safely and effectively use cleaning supplies
- Additional Information:**
 - Janitorial Tip Sheet [English](#) [Español](#)

- Do you have employees who are at higher risk for illness? [Review this CDC guidance.](#)
- If an employee is confirmed to have COVID-19 infection, employers should inform fellow employees of their possible exposure to COVID-19 in the workplace but maintain confidentiality as required by the Americans with Disabilities Act (ADA). The employer should instruct fellow employees about how to proceed based on the [CDC Public Health Recommendations for Community-Related Exposure.](#)
- CDC's [Interim Guidance for Businesses and Employers to Plan and Respond to COVID-19](#) for further considerations to reduce overall risk of exposure in the workplace.

Phase I - Allow E-commerce, Contactless Curbside Pickup & Home Delivery

Now that you have prepared, implement safety protocols to allow contactless pickup and at home deliveries. During this phase, stores should be closed to the public with limited number of employees in stores to fulfill online orders and curbside pickups. Home delivery of merchandise should have similar protocols as curbside pickup.

Store Checklist:

- Inform workers about the steps being taken in the workplace to establish social spacing, increased handwashing, and to prevent the spread of the virus.
- Require managers or floor leads to observe workers and train to address behaviors that may put workers at risk.
- Encourage employees to take their temperature before reporting to work.
- Require employees who feel sick or who have a temperature over 100.4 degrees to stay home and report it to a supervisor immediately.
- Prohibit gatherings or meetings of employees of 10 or more during working hours, permit employees to take breaks and lunch outside, in their office/personal workspace, or in areas where proper social spacing is attainable.
- Restrict interaction between employees and outside visitors or truck drivers; implement touchless receiving practices if possible.
- Adjust training/onboarding practices to limit number of people involved and allow for six-foot spacing; use virtual/video/audio training when possible.
- Discourage employees from using colleagues' phones, desks, workstations, radios, handhelds/wearables, or other work tools and equipment.
- Prohibit handshaking and unnecessary person to person contact in the workplace.
- Review Curbside/Pickup processes with employees performing this function.

PPE for Curbside:

- Require employees to wear face covering when taking merchandise to customer vehicle
- Place merchandise on the passenger seat or back seat
- Collect payment for unpaid merchandise
 - use wireless card reader and wipe down card reader for next use
 - take card to process in the store and return merchandise and card to customer

PPE for home delivery and/or installation services:

- Wear protective face coverings and gloves during at home delivery and/or installation services
- Ensure proper social spacing between employee and customer
- Clean and disinfect high contact surfaces throughout the duration of any installation.
- Clean and disinfect all surfaces upon completion
- Clean and disinfect all tools and supplies used throughout delivery or installation upon leaving the home

If an employee becomes sick during the shift:

- Send employee home immediately
- Clean and disinfect their workspace surfaces immediately
- Compile and trace those with whom the employee had contacts two days prior to having symptoms
- Coworkers who had contact within six feet of the employee two days prior is considered exposed

Modified Phase I

Some counties will be able to operate in a modified version of Phase II. Nearly all types of activities that are allowed in Phase II are allowed in a modified Phase I, just at lower capacities. You will need to follow all the Phase I guidelines and a modified part of Phase II. Those differences are as follows:

- **In-store retail****
All non-essential retail activities may operate but an establishment's occupancy may not be higher than 15 percent of capacity. Businesses are directed to provide signage encouraging indoor visits to less than 30 minutes, with face-to-face interactions limited to 30 minutes. Essential retail activities may continue to operate according to the existing state regulations.
- **Personal services**
All activities may operate subject to [Phase 2 guidance](#) with the exception that at no time may the number of customers be more than **25%** the number capable of being served at any one time, or 1 person if it is a single bed/chair studio.
- **Professional services****
All activities may operate subject to [Phase 2 guidance](#) with the exception that at no time may an establishment's occupancy be higher than **25%** and indoor services are limited to 30 minutes.
- **Pet grooming**
All activities may operate subject to [Phase 2 guidance](#) with the exception that at no time may an establishment's occupancy be higher than **25%**.

**Real estate, professional services, and in-store retail businesses will be directed to provide signage encouraging indoor visits to less than 30 minutes. At no time may face to face interactions last longer than 30 minutes.

King County businesses can get additional information [here](#).

Phase II - Re-open Stores to the Public, with Social Spacing Protocols and Reduced Occupancy

During this phase, retailers open their stores to the public with robust health and safety protocols in place to mitigate and, ideally, prevent the spread of the COVID-19.

Customer Traffic Management:

- Retail store occupancy must be limited to 30% of maximum building occupancy or lower, excluding employees, of the stated maximum store capacity according to section 1004.5 of the [National Fire Code](#). Here is a quick way to [calculate based on square footage](#).
- Place distance markers outside the store for waiting customers while maintaining physical distance; assign employees to assist customers waiting to enter.
- Arrange the flow of customers to eliminate choke points and reduce crowding in high traffic areas.
- Sneeze guards or other barriers should be placed throughout the retail establishment at all fixed places of potential interaction between employees that could be less than 6 feet.
- Place conspicuous signage at entrances and throughout the store alerting staff and customers to the required occupancy limits, six-foot physical distance, and policy on face covering. Retailers may brand their own signage and consider this [signage toolkit](#).
- Establish hours of operation, wherever possible, that permit access solely to high risk individuals, as defined by the [CDC](#).
- Demarcate six feet of spacing in check-out lines to guide appropriate social spacing
- Ensure six-foot distance between customers and cashiers and baggers, except when collecting payments and/or exchanging goods.
- Arrange contactless pay options, pickup, and/or delivery as much as possible.
 - If customer prefers cash/check payments, the employee **shall** properly sanitize hands or dispose of gloves right after completing the transaction and before waiting on the next customer.

Hygiene:

- Require infection control practices, such as regular hand washing, coughing and sneezing etiquette, and proper tissue usage and disposal.
- Have employees engage in repeated handwashing/sanitization throughout the workday.
- Provide sanitization materials, such as hand soap, hand sanitizer, and sanitizing wipes to employees.

Sanitization:

- Require frequent sanitization of high-touch areas like restrooms, fitting rooms, doors, PIN pads, and common areas including items like the shopping cart handle.
- Ensure operating hours allow downtime between shifts for thorough cleaning.
- Provide sanitization materials, such as sanitizing wipes, to employees to clean handhelds/wearables, scanners, radios, or other work tools and equipment before/after use.
- Clean and disinfect high-touch areas routinely, particularly in spaces that are accessible to staff, customers, and suppliers.
- Ensure cleaning procedures following a known or potential exposure in a facility comply with [CDC recommendations](#) for cleaning and disinfection.
- Have deep cleaning response plan in place should an associate become COVID positive.

Fitting Rooms:

- When they are being utilized during in-store operations, fitting rooms should be cleaned with appropriate disinfecting supplies after each new customer use by an employee wearing proper protective equipment.
- Any items used by customers in a fitting room and not purchased should be removed from active inventory on the sales floor and stored for a no less than 24 hours.

Protective Face Coverings:

- Require workers, contractors, and drivers to wear face coverings while on the premises.
- Strongly encourage customers to wear face coverings while on the premises.
- Post signage for customers to understand the importance of wearing face coverings.
- Here are the latest face covering guidelines:
 - [Which Mask for Which Task](#)
 - [Washington Coronavirus Hazard Considerations for Employers](#)

Additional Information:

- Reusable Shopping Bags - Unless prohibited by local mandates, allow customers to use their own reusable shopping bags as long as customers pack the bags themselves.
- Any in-store sit-down food and beverage services must follow all the [Phase 2 restaurant requirements](#).
- CDC's [Activities and Initiatives Supporting the COVID-19 Response and the President's Plan for Opening America Up Again](#) for further considerations to reduce overall risk of exposure in the workplace.
- Malls and Other Shopping Centers
 - Apply aforementioned in-store customer traffic management and sanitation guidance as it relates to additional customer common areas in all facilities.
 - Ensure all tenants adhere to curbside and/or in-store retail guidance.
- A full list of state reopening guidelines can be reviewed [here](#).

Phase III – Continue Protection and Expand Occupancy

Businesses will be required to follow the [Governor’s Phase 3 guidance](#). For the counties in Phase 3, you should have this form filled in and be part of your Accident prevention plan. During this phase, retailers open their stores to the public at occupancy rate (yet to be determined by Governor) with robust health and safety protocols in place to mitigate and, ideally, prevent the spread of the COVID-19.

Continue to follow previous Preparation Checklist, Phase I and II safety protocols which are designed to maintain sanitization consistent with health experts’ guidance.

Customer Traffic Management:

- Retail store occupancy must be (yet to be determined by Governor) of maximum building occupancy or lower, excluding employees, of the stated maximum store capacity according to section 1004.5 of the [National Fire Code](#). Here is a quick way to [calculate based on square footage](#)
- Remember to arrange contactless pay options, pickup, and/or delivery of goods wherever possible.

Sanitization:

- Provide sanitization materials, such as hand soap, hand sanitizer, and sanitizing wipes to staff.
- Sanitize frequently high-touch areas like restrooms, breakrooms, credit card machines, keypads, counters, and shopping carts.
- Clean and disinfect high-touch areas routinely, particularly in spaces that are accessible to staff, customers, and suppliers, and ensure cleaning procedures following a known or potential exposure in a facility are following CDC recommendations.

Employee Guidelines:

- Continue facial coverings where social distancing is not attainable.
- Require infection control practices, such as regular hand washing, coughing and sneezing etiquette, and proper tissue usage and disposal.
- Encourage employees to frequently handwash/sanitize throughout the workday.
- Separate employees who become sick during the day and send home.
- Encourage employees to not come to work when they do not feel well.