



# COVID-19 INDUSTRY GUIDANCE: Automobile Dealerships and Rentals

July 29, 2020

[covid19.ca.gov](https://covid19.ca.gov)



## OVERVIEW

On March 19, 2020, the State Public Health Officer and Director of the California Department of Public Health issued an order requiring most Californians to stay at home to disrupt the spread of COVID-19 among the population.

The impact of COVID-19 on the health of Californians is not yet fully known. Reported illness ranges from very mild (some people have no symptoms) to severe illness that may result in death. Certain groups, including people aged 65 or older and those with serious underlying medical conditions, such as heart or lung disease or diabetes, are at higher risk of hospitalization and serious complications. Transmission is most likely when people are in close contact or in a poorly ventilated area with an infected person, even if that person does not have any symptoms or has not yet developed symptoms.

Precise information about the number and rates of COVID-19 by industry or occupational groups, including among critical infrastructure workers, is not available at this time. There have been multiple outbreaks in a range of workplaces, indicating that workers are at risk of acquiring or transmitting COVID-19 infection. Examples of these workplaces include hospitals, long-term care facilities, prisons, food production, warehouses, meat processing plants, and grocery stores.

As stay-at-home orders are modified, it is essential that all possible steps be taken to ensure the safety of workers and the public.

Key prevention practices include:

- ✓ physical distancing to the maximum extent possible,
- ✓ use of face coverings by workers (where respiratory protection is not required) and customers/clients,
- ✓ frequent handwashing and regular cleaning and disinfection,
- ✓ training workers on these and other elements of the COVID-19 prevention plan.

In addition, it will be critical to have in place appropriate processes to identify new cases of illness in workplaces and, when they are identified, to intervene quickly and work with public health authorities to halt the spread of the virus.

## PURPOSE

This document provides guidance for automobile dealerships and rental operators to support a safe, clean environment for workers.

**NOTE:** Automotive dealerships and renters that operate repair and/or car washing operations should follow the guidance for limited service providers available on the [COVID-19 Resilience Roadmap website](#).

The guidance is not intended to revoke or repeal any worker rights, either statutory, regulatory or collectively bargained, and 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.<sup>1</sup> Stay current on changes to public health guidance and state/local orders, as the COVID-19 situation continues. Cal/OSHA has more safety and health guidance on their [Cal/OSHA Guidance on Requirements to Protect Workers from Coronavirus webpage](#). CDC has additional guidance [for businesses and employers](#).

## Required Use of Face Coverings

On June 18, CDPH issued [Guidance on the Use of Face Coverings](#), which broadly requires the use of face coverings for both members of the public and workers in all public and workplace settings where there is a high risk of exposure.

People in California must wear face coverings when they are engaged in work, whether at the workplace or performing work off-site, when:

- Interacting in-person with any member of the public;
- Working in any space visited by members of the public, regardless of whether anyone from the public is present at the time;
- Working in any space where food is prepared or packaged for sale or distribution to others;
- Working in or walking through common areas, such as hallways, stairways, elevators, and parking facilities;
- In any room or enclosed area where other people (except for members of the person's own household or residence) are present when unable to physically distance;
- Driving or operating any public transportation or paratransit vehicle, taxi, or private car service or ride-sharing vehicle when passengers are present. When no passengers are present, face coverings are strongly recommended.

Complete details, including all requirements and exemptions to these rules, can be found in the [guidance](#). Face coverings are strongly encouraged in other circumstances, and employers can implement additional face covering requirements in fulfilling their obligation to provide workers with a safe and healthful workplace. Employers must provide face coverings to workers or reimburse workers for the reasonable cost of obtaining them.

Employers should develop an accommodation policy for any worker who meets one of the exemptions from wearing a face covering. If a worker who would otherwise be required to wear a face covering because of frequent contact with others cannot wear one due to a medical condition, they should be provided with a non-restrictive alternative, such as a face shield with a drape attached to the bottom edge, if feasible, and if the medical condition permits it.

Businesses that are open to the public should be cognizant of the exemptions to wearing face coverings in the [CDPH Face Covering Guidance](#) and may not exclude any member of the public for not wearing a face covering if that person is complying with the [guidance](#). Businesses will need to develop policies for handling these exemptions among customers, clients, visitors, and workers.



## Workplace Specific Plan

- Establish a written, workplace-specific COVID-19 prevention plan at every facility, perform a comprehensive risk assessment of all work areas and work tasks, and designate a person at each facility to implement the plan.
- Incorporate the [CDPH Face Covering Guidance](#) into the Workplace Specific Plan and include a policy for handling exemptions.
- Identify contact information for the local health department where the facility is located for communicating information about COVID-19 outbreaks among workers.
- Train and communicate with workers and worker representatives on the plan and make the plan available to workers and their representatives.
- Regularly evaluate the workplace for compliance with the plan and document and correct deficiencies identified.
- Investigate any COVID-19 illness and determine if any work-related factors could have contributed to risk of infection. Update the plan as needed to prevent further cases.
- Implement the necessary processes and protocols when a workplace has an outbreak, in accordance with [CDPH guidelines](#).
- Identify close contacts (within six feet for 15 minutes or more) of an infected worker and take steps to isolate COVID-19 positive worker(s) and close contacts.
- Adhere to the guidelines below. Failure to do so could result in workplace illnesses that may cause operations to be temporarily closed or limited.



## Topics for Worker Training

- Information on [COVID-19](#), how to prevent it from spreading, and which underlying health conditions may make individuals more susceptible to contracting the virus.
- Self-screening at home, including temperature and/or symptom checks using [CDC guidelines](#).
- The importance of not coming to work:

- If a worker has symptoms of COVID-19 as [described by the CDC](#), such as a fever or chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, congestion or runny nose, nausea, vomiting, or diarrhea OR
- If a worker was diagnosed with COVID-19 and has not yet been released from isolation, OR
- If, within the past 14 days, a worker has had contact with someone who has been diagnosed with COVID-19 and is considered potentially infectious (i.e. still on isolation).
- To return to work after a worker receives a COVID-19 diagnosis only if 10 days have passed since symptoms first appeared, their symptoms have improved, and the worker has had no fevers (without the use of fever reducing medications) for the last 72 hours. A worker without symptoms who was diagnosed with COVID-19 can return to work only if 10 days have passed since the date of the first positive COVID-19 test.
- To seek medical attention if their symptoms become severe, including persistent pain or pressure in the chest, confusion, or bluish lips or face. Updates and further details are available on [CDC's webpage](#).
- The importance of frequent handwashing with soap and water, including scrubbing with soap for 20 seconds (or using hand sanitizer with at least 60% ethanol (preferred) or 70% isopropanol (if the product is inaccessible to unsupervised children) when workers cannot get to a sink or handwashing station, per [CDC guidelines](#)).
- The importance of physical distancing, both at work and off work time (see Physical Distancing section below).
- Proper use of face coverings, including:
  - 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 handwashing.
  - Face coverings must cover the nose and mouth.
  - Workers should wash or sanitize hands before and after using or adjusting face coverings.
  - Avoid touching eyes, nose, and mouth.
  - Face coverings must not be shared and should be washed or discarded after each shift.

- Information contained in the [CDPH Guidance for the Use of Face Coverings](#), which mandates the circumstances in which face coverings must be worn and the exemptions, as well as any policies, work rules, and practices the employer has adopted to ensure the use of face coverings. Training should also include the employer's policies on how people who are exempted from wearing a face covering will be handled.
- Ensure any independent contractors, temporary, or contract workers at the facility are also properly trained in COVID-19 prevention policies and have necessary supplies and PPE. Discuss these responsibilities ahead of time with organizations supplying temporary and/or contract workers.
- Information on paid leave benefits the worker may be entitled to receive that would make it financially easier to stay at home. See additional information on [government programs supporting sick leave and worker's compensation for COVID-19](#), including workers' sick leave rights under the [Families First Coronavirus Response Act](#) and workers' rights to workers' compensation benefits and presumption of the work-relatedness of COVID-19 pursuant to the Governor's [Executive Order N-62-20](#) while that Order is in effect.



## Individual Control Measures and Screening

- Provide temperature and/or symptom screenings for all workers at the beginning of their shift and any vendors, contractors, or other workers entering the establishment. Make sure the temperature/symptom screener avoids close contact with workers to the extent possible.
- If requiring self-screening at home, which is an appropriate alternative to providing it at the establishment, ensure that screening was performed prior to the worker leaving the home for their shift and follows [CDC guidelines](#), as described in the Topics for Worker Training section above.
- Encourage workers who are sick or exhibiting symptoms of COVID-19 to stay home.
- Employers must provide and ensure workers use all required protective equipment, including eye protection and gloves where necessary.
- Employers should consider where disposable glove use may be helpful to supplement frequent handwashing or use of hand sanitizer; examples are for workers who are screening others for symptoms or handling commonly touched items.

- Employers must take reasonable measures, including posting signage in strategic and highly-visible locations, to remind the public that they must use face coverings and practice physical distancing, and that they should frequently wash their hands with soap for at least 20 seconds use hand sanitizer, and not touch their face.
- Remind guests in advance to bring a face covering and make them available to anyone who arrives without one, if possible.
- Customers and visitors to showrooms and shared work areas should be temperature and/or symptom screened upon arrival, asked to use hand sanitizer, and to wear a face covering. Face coverings should be provided to guests who arrive without them.
- Display a set of clearly visible rules for guests at entrance(s) that are to be a condition of entry. The rules could include instructions to use hand sanitizer, wear face coverings during the visit, maintain physical distance from workers and other guests/groups, avoid unnecessary touching of surfaces, contact information for the local health department, and changes to services. Whenever possible, the rules should be available digitally and include pictograms.



## Cleaning and Disinfecting Protocols

- Perform thorough cleaning in high traffic areas such as showrooms, waiting areas, break rooms, and areas of ingress and egress including stairways and elevator controls. Frequently disinfect commonly used surfaces, including counters, credit card machines, touchscreens, doorknobs, armrests, toilets, handwashing facilities, door handles, vehicle keys, and vehicles displayed in the showroom (door handles, seat adjustment controls, radio).
- Clean touchable surfaces between shifts or between users, whichever is more frequent, including but not limited to working surfaces, keys, and stationary and mobile equipment controls.
- Avoid sharing phones, tablets, office equipment, or tools wherever possible. Never share PPE.
- Regularly clean and sanitize shared equipment, such as time clocks, payment portals, pens, and styluses between each use.
- Provide time for workers to implement cleaning practices during their shift. Cleaning assignments should be assigned during working hours as part of the worker's job duties.
- Equip terminals, desks, and help counters with proper sanitation

products, including hand sanitizer and sanitizing wipes, and provide personal hand sanitizers to all staff directly assisting customers.

- Ensure that sanitary facilities stay operational and stocked at all times and provide additional hand sanitizer when needed.
- When choosing disinfecting chemicals, employers should use products approved for use against COVID-19 on the [Environmental Protection Agency \(EPA\)-approved](#) list and follow product instructions. Use 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. Provide workers training on the chemical hazards, manufacturer's directions, ventilation requirements, and Cal/OSHA requirements for safe use. Workers using cleaners or disinfectants should wear gloves as required by the product instructions. Follow the [asthma-safer cleaning methods](#) recommended by the California Department of Public Health and ensure proper ventilation.
- Provide hand sanitizer dispensers throughout showrooms, lobbies, and service areas, for use by customers and workers.
- Dedicate workers to sanitize vehicles returning from rental and test drives as well as other high-touch surfaces in lobbies, showrooms, and offices.
- Where possible, do not clean floors by sweeping or other methods that can disperse pathogens into the air. Use a vacuum with a HEPA filter on facility and automobile surfaces wherever possible.
- Use protective barriers such as disposable mats and seat covers when applicable, such as during test drives and moving returned vehicles.
- Adjust or modify store hours to provide adequate time for regular deep cleaning.
- Install and encourage the use of credit cards and hands-free devices, if possible, including motion sensor lights, contactless payment systems, automatic soap and paper towel dispensers, and timecard systems.
- Inspect deliveries and take all necessary and feasible disinfection measures when receiving goods.
- Consider installing portable high-efficiency air cleaners, upgrading the building's air filters to the highest efficiency possible, and making other modifications to increase the quantity of outside air and ventilation in offices and other spaces.



## Physical Distancing Guidelines

- Implement measures to ensure physical distancing of at least six feet between workers and customers. This can include use of physical partitions or visual cues (e.g., floor markings, colored tape, or signs to indicate where workers and/or workers should stand).
- Take measures in areas where physical distancing cannot be maintained to minimize exposure between workers and customers, such as Plexiglas or other appropriate barriers, if feasible.
- Consider offering workers who request modified duties options that minimize their contact with customers and other workers (e.g., managing inventory rather than working as a cashier or managing administrative needs through telework).
- Adjust meetings to ensure physical distance and use smaller individual meetings at facilities to maintain physical distancing guidelines. Decrease the capacity for conference and meeting rooms in order to maintain at least six feet of physical distance between workers.
- Close or restrict common areas where personnel are likely to congregate and interact, such as kitchenettes and break rooms. Close self-service coffee, water, and snack areas, unless they are capable of dispensing without physical touching. Where possible, create outdoor break areas with shade covers and seating that ensures physical distancing.
- Reconfigure office spaces, cubicles, etc. to ensure workspaces allow for six feet between workers. Provide a single, clearly designated entrance and separate exit to help maintain physical distancing, wherever possible.
- Place additional limitations on the number of workers in enclosed areas like supply closets, to ensure at least six feet of separation to limit transmission of the virus.
- Stagger worker breaks, in compliance with wage and hour regulations, to maintain physical distancing protocols.
- Adjust maximum occupancy rules based on the size of your facility to limit the number of people in a store, office, or showroom at one time. Capacity limits should be low enough to ensure physical distancing but in no case more than 50% maximum occupancy.
- Limit passengers in the vehicle during test drives to only a single customer with the worker sitting in opposite back seat, when applicable.

- Encourage customer appointments and have customers practice physical distancing while waiting for service using visual cues or ask customers to wait in their vehicles.
- Offer curbside delivery or pickup and move sales and agreements to remote/digital platforms as feasible.
- Limit shuttle services whenever possible. Employers should follow this guidance in addition to applicable transit guidance as it becomes available on the [COVID-19 Resilience Roadmap website](#).
- Require workers to not use handshakes and similar greetings that break physical distance.

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<sup>1</sup>Additional requirements must be considered for vulnerable populations. Employers must comply with all [Cal/OSHA](#) standards and be prepared to adhere to its guidance as well as guidance from the [Centers for Disease Control and Prevention \(CDC\)](#) and the [California Department of Public Health \(CDPH\)](#). Additionally, employers must be prepared to alter their operations as those guidelines change.

