



# COVID-19 INDUSTRY GUIDANCE:

## Shopping Malls, Destination Shopping Centers, and Swap Meets

October 20, 2020

[covid19.ca.gov](https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Industry-Guidance-20201020.aspx)



# 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, restaurants, 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,
- ✓ 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 shopping malls, destination shopping centers, and swap meets (referred to collectively as “shopping center operators”) to support a safe, clean environment for workers, customers, and the public. Businesses must identify and monitor the County Risk Level for the county the business is operating in and make required adjustments to their operations:

- **Purple – Widespread – Tier 1:** Indoor operations are permitted but must be limited to 25% capacity. Common areas and food courts must be closed but restaurants can offer take-out dining. Shopping centers must follow the modifications in this guidance.
- **Red – Substantial – Tier 2:** Indoor operations are permitted but must be limited to 50% capacity. Common areas must be closed. Food courts can open but must operate at 25% capacity or 100 people, whichever is lower. Shopping centers must follow the modifications in this guidance.
- **Orange – Moderate – Tier 3:** Indoor operations are permitted at full capacity. Common areas must be closed. Food courts can open but must operate at 50% capacity or 200 people, whichever is lower. Shopping centers must follow the modifications in this guidance.
- **Yellow – Minimal – Tier 4:** Indoor operations are permitted at full capacity. Common areas can open. Food courts can open but must operate at 50% capacity. Shopping centers must follow the modifications in this guidance.

Shopping centers with family entertainment centers, movie theaters, restaurants, bars, spas, nail salons, or other personal care services should refer those retail tenants to the modifications and guidance that apply to such industries on the [Industry Guidance to Reduce Risk](#) site. Those entities are responsible for implementing the guidance, but shopping center operators should do what they can to encourage such action is taken. Shopping center operators must acknowledge that retail tenants and vendors should only open when they are ready and able to implement the necessary safety measures to provide for the safety of their workers and customers.

For the most updated information on county status and to see which tier your business is operating under, visit [Blueprint for a Safer Economy](#). Please note that local health departments can have more restrictive criteria and different closures. Find [your county's local information](#).

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> 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](#) and specific guidance for [grocery and food retailers](#). FDA has best practices for [retail food stores, restaurants, and food pick-up/delivery services](#).

## 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. Complete details, including all requirements and exemptions to these rules, can be found in the [guidance](#).

The [CDPH Face Covering Guidance](#) is subject to additional updates based on the current scientific understanding of transmission of the virus causing COVID-19. Please check the CDPH website for any revisions.



## Workplace Specific Plan

- Establish a written, workplace-specific COVID-19 prevention plan at every location, perform a comprehensive risk assessment of all work areas and work tasks, and designate a person at each establishment 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 operation is located for communicating information about COVID-19 outbreaks among workers or customers.
- Train and communicate with workers and worker representatives on the plan and make the plan available to workers and their representatives.
- Regularly evaluate the establishment 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](#) and orders or guidance from the local health department.
- 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.
- Notify all employees in writing, and employers of subcontracted employees, who may have been exposed to COVID-19 and report workplace outbreaks to the local health department. For additional information on employer responsibilities under [AB 685](#) (Chapter 84, Statutes of 2020), refer to the [Enhanced Enforcement and Employer Reporting Requirements](#) from Cal/OSHA and the [Employer Questions about AB 685](#) from CDPH.
- 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

[people are at higher risk](#) for severe illness or death.

- 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 after meeting [CDPH Guidance on Returning to Work or School Following COVID-19 Diagnosis](#).
- 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](#)). Never use hand sanitizers with [methanol](#) due to its high toxicity to both children and adults.
- 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 are not personal protective equipment (PPE).
  - Face coverings 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 the 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 workers' compensation for COVID-19](#), including workers' sick leave rights under the [Families First Coronavirus Response Act](#).



## 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.
- Remind guests in advance to bring a face covering, otherwise they

should not be allowed to enter the premises (unless exempted per the [CDPH Face Covering Guidance](#)). Consider making face coverings available for guests who may arrive without them.

- Shopping centers must take reasonable measures, including posting signage in strategic and highly-visible locations, to remind workers, retail tenants, vendors, and the public that they must use face coverings and maintain physical distancing.



## Ventilation, Cleaning, and Disinfecting Protocols

- Where possible, install portable high-efficiency air cleaners, upgrade the building's air filters to the highest efficiency possible, and make other modifications to increase the quantity of outside air and ventilation in offices and other indoor spaces.
- Check the [CDPH website](#) periodically for updates on indoor air quality and ventilation guidance for airborne diseases in indoor settings.
- Perform thorough cleaning in high traffic areas, such as restrooms, worker break rooms, and entrances and exits, including doors and door handles, stairways, escalator handrails, and elevator controls.
- Frequently disinfect commonly used surfaces, including benches, counters, ATM PIN pads, registers, water fountains (spout, button/lever, and nozzle), guardrails, displays, hand-held devices, shelving, customer assistance call buttons, handwashing and sanitation facilities, mall seating, touch screens, facility maps, vending machines, etc.
- Regularly clean and disinfect shared equipment between each use, such as time clocks, radios, and headsets for workers as well as wheelchairs, strollers, mobilized devices, carts, baskets, or other equipment frequently used by shoppers.
- Regularly wipe down touchable surfaces, including but not limited to working surfaces, registers, touchscreens, computer monitors, and stationary and mobile equipment controls.
- To minimize the risk of [Legionnaires' disease](#) and other diseases associated with water, [take steps](#) to ensure that all water systems and features are safe to use after a prolonged facility shutdown.
- Avoid sharing audio equipment, phones, tablets, laptops, desks, pens, and other work supplies wherever possible. Never share PPE.
- Discontinue shared use of audio headsets and other equipment between



workers unless the equipment can be properly disinfected after use. Consult equipment manufacturers to determine appropriate disinfection steps, particularly for soft, porous surfaces such as foam earmuffs.

- Provide time for workers to implement cleaning practices during their shift. Cleaning assignments should be assigned during working hours as part of the workers' job duties. Procure options for third-party cleaning companies to assist with the increased cleaning demand, as needed.
- Equip customer entrances and exits, promenades, and other common-space areas with proper sanitation products, including hand sanitizer. Display signage indicating where the nearest hand sanitizer dispenser is located. Check hand sanitizer dispensers periodically and refill before they run out.
- When choosing disinfecting chemicals, 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 must wear gloves and other protective equipment as required by the product instructions. Follow the [asthma-safer cleaning methods](#) recommended by the California Department of Public Health and ensure proper ventilation.
- Ensure that sanitary facilities stay operational and stocked at all times and provide additional soap, paper towels, and hand sanitizer when needed.
- Where possible, do not clean floors by sweeping or other methods that can disperse pathogens into the air unless all persons in the area have appropriate PPE. Use a vacuum with a HEPA filter wherever possible.
- Encourage the use of credit cards at retail tenant and vendor locations and install hands-free devices, if possible, including motion sensor lights, contactless payment systems, automatic faucets, soap, and paper towel dispensers, and timecard systems.
- Adjust or modify shopping center hours to provide adequate time for regular deep cleaning and product stocking.



## Physical Distancing Guidelines

- **WARNING:** physical distancing alone is insufficient to prevent transmission of COVID-19.

- Implement measures to ensure physical distancing of at least six feet between and among workers and customers in all shopping center locations. This can include use of physical partitions or visual cues (e.g., floor markings, colored tape, or signs to indicate to where workers and/or customers should stand).
- Take measures at customer service desks or other areas where physical distancing cannot be maintained to minimize exposure between workers and customers, such as Plexiglas or other barriers.
- 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).
- On-property security staff should actively remind and encourage customers and the public to comply with the physical distancing standards.
- Create clearly-marked curbside or outside pickup points, that maintain physical distance with visual cues or other measures, and have purchased goods available there or available through home delivery.
- Shopping center operators, retail tenants, and vendors should also identify additional strategies to increase pickup and delivery service options for customers to help minimize in-store contact and maintain physical distancing, such as online ordering and returns-processing from shoppers' vehicles with no direct hand-off of items.
- Develop and implement controlled foot traffic and crowd management strategies that enable at least six feet physical distancing between customers. This can include requiring foot traffic be one-directional and guiding customers with visual cues, physical props, and signage. Provide clearly designated entrances and separate exits, if feasible and appropriate for the space, to help maintain physical distancing and support crowd control. Wherever possible, doors should be left open if they do not open and close automatically. Work with tenants to create queue systems for customers outside individual stores while still maintaining physical distance, if necessary.
- Shopping center operators, retail tenants, and vendors should collaborate to develop store entry queuing systems that do not disrupt foot traffic or violate physical distancing requirements. Consider and encourage alternate entry to retail tenant facilities, including digital reservations for entry and pre-order guidelines.
- Vendor carts or kiosks should only be permitted to operate in shopping center aisles or walking areas if they do not interfere with updated foot

traffic measures or inhibit physical distancing requirements. Reconfigure vendor carts or kiosks, where necessary, to ensure queuing does not impede physical distancing requirements.

- Open-air shopping centers, such as swap meets, should ensure that vendors space tables, tents, and other displays are in accordance with appropriate physical distancing requirements or ensure other impermeable barriers are in place.
- Shopping center operators should collaborate with retail tenants and vendors to identify opportunities that make use of unused or reconfigured real estate for revenue-generating opportunities in accordance with local regulations and that support physical distancing requirements. This could include expanding restaurant dining space in real estate managed by the shopping center operator, e.g. promenades or modified parking spaces.
- Work with retail tenants and vendors to consider dedicated shopping hours for vulnerable populations, including seniors and those medically vulnerable, preferably at a time following a complete cleaning.
- Chairs, seating, benches, and other public spaces should be reconfigured to enable physical distancing requirements.
- Hold meetings over the phone or via webinar for workers wherever possible. If not feasible, adjust staff meetings to ensure physical distancing and use smaller individual meetings at facilities to maintain physical distancing guidelines. Place additional limitations on the number of workers in enclosed areas to ensure at least six feet of separation to limit transmission of the virus.
- Ensure workers can maintain physical distance in breakrooms, using barriers, increasing distance between tables/chairs to separate workers, etc. Where possible, create outdoor break areas with shade coverings and seating arrangements that ensures physical distancing. Discourage workers from congregating during breaks and ensure they are not eating or drinking without face coverings within six feet of each other.
- Implement physical distancing requirements at loading bays and move to contactless signatures for deliveries.

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<sup>1</sup>Additional requirements must be considered for vulnerable populations. Shopping center operators 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 should be prepared to alter their operations as those guidelines change.

