

Guidelines – Automobile Dealerships and Rental Operators

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 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 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 employees (where respiratory protection is not required) and customers/clients,
- ✓ frequent handwashing and regular cleaning and disinfection,
- ✓ training employees 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. The guidance is not intended to revoke or repeal any employee 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.¹ 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](#).

Worksite Specific Plan

- Establish a written, worksite-specific COVID-19 prevention plan at every facility, perform a comprehensive risk assessment of all work areas, and designate a person at each facility to implement the plan.
- Identify contact information for the local health department where the facility is located, for communicating information about COVID-19 outbreaks among employees.
- Train and communicate with employees and employee representatives on the plan.
- Regularly evaluate the facility 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.
- Identify close contacts (within six feet for 10 minutes or more) of an infected employee and take steps to isolate COVID-19 positive employee(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 Employee 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 employees have a frequent cough, fever, difficulty breathing, chills, muscle pain, headache, sore throat, recent loss of taste or smell, or if they or someone they live with have been diagnosed with COVID-19.

¹Additional 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.

- 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 or 70% isopropanol when employees 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.
 - Employees should wash or sanitize hands before and after using or adjusting face coverings.
 - Avoid touching the eyes, nose, and mouth.
 - Face coverings should be washed after each shift.

Individual Control Measures and Screening

- Provide temperature and/or symptom screenings for all workers at the beginning of their shift and any personnel entering the facility. Make sure the temperature/symptom screener avoids close contact with workers to the extent possible. Both screeners and employees should wear face coverings for the screening.
- Encourage workers who are sick or exhibiting symptoms of COVID-19 to stay home.
- Employers should provide and ensure workers use all required protective equipment. 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.
- Face coverings are strongly recommended when employees are in the vicinity of others. Workers should have face coverings available and wear them when at work, in dealership facilities and showrooms, in offices, or in a vehicle for work-related travel with others. Face coverings must not be shared.
- Employers must take reasonable measures to remind the public that they should use face coverings.

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.
- 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 cleaning 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 employees training on manufacturer's directions and Cal/OSHA requirements for safe use. Workers using cleaners or disinfectants should wear gloves as required by the product instructions.
- Provide hand sanitizer dispensers throughout showrooms, lobbies, and service areas, for use by customers and employees.
- Dedicate employees to sanitize vehicles returning from rental and test drives as well as other high-touch surfaces in lobbies, showrooms, and offices.
- 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 employees should stand).

- Take measures in areas where physical distancing cannot be maintained to minimize exposure between employees and customers, such as Plexiglas or other appropriate barriers, if feasible. Where barriers are not feasible, employees are strongly recommended to wear face coverings. Some jurisdictions already require face coverings outside the home.
- 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 employees.
- 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.
- Redesign office spaces, cubicles, etc. to ensure workspaces allow for six feet between employees. 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 employee 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.
- Ask vendors who are required to enter the location to have their employees follow the guidance of local, state and federal governments regarding wearing face coverings and PPE.
- Limit passengers in the vehicle during test drives to only a single customer with the employee sitting in opposite back seat, when applicable. Both customer and employee are strongly encouraged to wear face coverings.
- 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.
- Discontinue shuttle services.
- Require employees to not use handshakes and similar greetings that break physical distance.